The Dean Close Foundation Schools

Independent, Co-educational, Day and Boarding Schools

Safeguarding and Child Protection Policy (W044)
Ratified by trustees on 20th September 2025

Registered Charity No: 1086829

Date of Issue: September 2025
Review Date: September 2026
Owner: Foundation Lead for Safeguarding and Health

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 (2025)*
    b. *Working Together to Safeguard Children (2023)*
    c. *Gloucestershire Safeguarding Children Partnership Procedures Manual 2024 (https://gloucestershirescp.trixonline.co.uk/)*
    d. *Oxfordshire Safeguarding Children Partnership (OSCP) manual 2025 (https://oscp.trixonline.co.uk/)*
    e. *What to do if you are worried a child is being abused guidance (2015)*
    f. *Boarding Schools National Minimum Standards, standards 8, 19 and 20 (September 2022)*
    g. *The Children Act (1989 and 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 Counterterrorism 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. *Mandatory reporting of child sexual abuse consultation (2023)*
    n. *Teaching online safely in school DfE June 2019*
    o. *Meeting digital and technology standards in schools and colleges (Gov.UK 2022)*
    p. *Information sharing DfE July 2018*
    q. *Sexual Violence and Sexual Harassment between children in Schools and Colleges (2021)*
    r. *Sharing Nudes and Semi-Nudes (2020)*
    s. *Human Rights Act 1998*
    t. *Equality Act 2010.*

3. Each school and part of the Foundation, 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)
01242 258000
chsmontgomery@deanclose.org.uk

Deputy DSL:
Kate Milne (Housemistress of Hatherley)

Deputy DSL (Administration):
Heather Turner (Pastoral & SEND Administrator)

07739 026163
kemilne@deanclose.org.uk

01242 258000
hcturner@deanclose.org.uk

the DSL at Dean Close Kingham Hill is:
Rob Jones (Second Deputy)
01608 658999
R.jones@kinghamhill.org

The deputy DSLs are:
Tim Martin t.martin@kinghamhill.org
Ester Blount e.blount@kingham.org

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

The Deputy DSL is:
Phil Richardson (Deputy Head)
07471 350706
richardsonp@sdeanclosestjohns.org.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:
Jo Sheldon (Housemistress)
01242 258030 or 07977 557002
jrsheldon@deanclose.org.uk

The DSL at Dean Close Pre-Preparatory School is:
Nicole Radley (Deputy Head)
07859 199846
nrradley@deanclose.org.uk

The Deputy DSL is:
Anna Moorhouse (KS1 Coordinator)
07748 408845
avmoorhouse@deanclose.org.uk

The DSL at Airthrie School is:
Matthew Medhurst (Pastoral Lead)
01242 512837
Matthew.Medhurst@airthrie-school.co.uk

The Deputy DSL is:
Jason Dobbie (Headmaster)
07471 350706 or 01242 512837
jason.dobbie@airthrie-school.co.uk

The DSL at Dean Close Services Limited is:
Marie Widdowson (Commercial Director)
01242 258023
Duty mobile 07469 159825
mwiddowson@deanclose.org.uk

The Deputy is:
Sam Taylor (Commercial Manager)
01242 267431
Duty mobile 07469 159825
srjtaylor@deanclose.org.uk

5. Other useful contact details

Gloucestershire Social Care:
Multi Agency Safeguarding Hub (MASH): 01452 426565 (Monday – Friday 8am – 5pm)
https://children.gloucestershire.gov.uk/web/portal/pages/home
childrenshelpdesk@gloucestershire.gov.uk
Emergency Social Care duty team: 01452 614194 (Out of hours)
Oxfordshire Social Care: 01865 519800
Multi Agency Safeguarding Hub (MASH): 0345 050 7666
Referral form https://myehmportal.oxfordshire.gov.uk/web/portal/pages/requestforservice#h1)
https://www.oxfordshire.gov.uk/business/information-providers/multi-agency-safeguarding-hub

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

Local Authority Designated Officer (LADO) 01452 426994
nigel.hatton@gloucestershire.gov.uk or amadmin@gloucestershire.gov.uk

Ofsted 0300 123 1231

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 Counterterrorism 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. Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harm and abuse, protecting pupils from this risk is part of the Dean Close Foundation safeguarding approach.

8. 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.

9. 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.

10. 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.

11. **Trustees:** Each School and area within The Dean Close Foundation has a designated member of the Board of Trustees with particular responsibility for oversight of Safeguarding matters; they are currently:

    a. Mrs Debra Ritsperis (Foundation Lead Nominated Safeguarding Trustee)
    b. Mr Stephen Holliday (DCS)
    c. Mr Ray Locke (DCPS)
    d. Mrs Debra Ritsperis (DCPPS)
    e. Mrs Caroline Pellereau (DCSJS)
    f. Mr Simon Bullingham (DCAS)
    g. Mrs Debra Ritsperis (DCKHS)
    h. Mr Matt Cansdale (DCSL)

The group of Nominated Safeguarding Trustees meets at least termly under the chairmanship of the Trustee nominated with responsibility for DCF Safeguarding Oversight, Mrs Debra Ritsperis.

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

Childcare (disqualification) Regulations 2009

12. 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.

13. 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.

14. 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 Foundation they normally work in, will be assessed using the disqualification criteria.

15. 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.

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 for the Foundation.

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 committed to promoting 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.

21. The Foundation and the Trustees are committed to providing appropriate training and support to all staff in matters of pupil safeguarding including:

    a. Training at least every two years for each DSL and Deputy DSL as well as encouraging relevant CPD
    b. Training at least every three years for all other members of staff, and every two years for those in EYFS
    c. Providing safeguarding updates to staff at least termly by a variety of methods
    d. Compliance with all safer recruitment legislation and good practice
    e. Ensuring that all staff are given and read as a minimum Part One (or Annex A) of KCSIE and a record kept of who has, in the HR database, Cascade
    f. Ensuring that all staff are given and have read this policy and a record is kept of who has
    g. Ensure that all staff are aware of online safety procedures for pupils and relevant e-safety policies including appropriate filtering and monitoring and have signed an acceptable use agreement
    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 in each setting
    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, encouraging a culture of professional curiosity
    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, those for whom English isn't their first language, and looked after children are more vulnerable to abuse
    n. A young person who identifies as LGBTQ+ or a child who is perceived as LGBTQ+, a child who is gender questioning or is perceived as gender questioning can be targeted by other children and adults for abuse. Staff must be aware of such children and ensure that they have a safe space to speak out and share any concerns they may have
    o. Monitoring children who have been identified as 'at risk' or 'in need'
        - The Children's Act 1989 section 17 defines a child in need 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

- The Children's Act 1989 section 47 defines a child at risk 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 all types of exploitation

p. Ensuring that the Foundation recognises the importance of Inter-Agency work by maintaining contact with relevant local agencies and Early Help
q. 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
r. Ensuring that all staff are aware of the possibility of Child-on-Child abuse which may include sexual violence and sexual harassment and may occur online
s. Ensure that pupils and staff are aware of the safeguarding risks associated with remote learning and that adequate guidance is in place (see appendix C)
t. Ensuring that key concepts of Safeguarding and Child Protection are integrated into the curriculum across the Foundation at an age-appropriate level
u. Creating an environment where pupils feel secure, have their viewpoints valued, are encouraged to talk, and are listened to
v. To ensure that all Foundation pupils are always safeguarded whether on or off Foundation premises whilst under the care of the Foundation. 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
w. Ensuring that all pupils know of at least one adult that they can approach if they are worried or in difficulty
x. Ensuring that pupils know how to stay safe, including online and are aware of the appropriate filtering and monitoring systems in place
y. Ensuring that outside agencies are involved where appropriate in safeguarding matters
z. Ensuring that all staff are aware of how to refer to Social Care via the Gloucestershire Multi Agency Safeguarding Hub (MASH) or the Oxfordshire MASH or Newport Children and Family Services or other authority
aa. Keeping an open mind about the possibility of a Safeguarding or Child Protection issue arising and encouraging an 'it can happen here attitude'
bb. Ensuring that all staff feel confident to self-refer Low Level Concerns, where, for example, they have found themselves in a situation which could be misinterpreted, 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
cc. A recognition by all staff and trustees that the Data Protection Act 2018 and the UK General Dat Protection Regulation (UK GDPR) place duties on individuals and organisations to process personal information fairly and lawfully and to keep the information they hold safe and secure
dd. Ensure that staff feel confident referring the actions of other staff as a Low Level Concern if they are unsure of the behaviour of that staff member concerning children

ee. Ensuring that staff always act in the best interests of the child
ff. Ensuring all staff participate fully in the provision of Early Help as required
gg. Ensuring that staff are aware of the procedures if a child is missing from education.

22. **Terminology**

a. Safeguarding and promoting the welfare of children refers to the process of protecting children from abuse, neglect or exploitation, 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 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, Kingham Hill School, Dean Close Preparatory School and Dean Close Pre-Preparatory School, Dean Close St. John's and Dean Close Airthrie School. It includes all policies, procedures and personnel attached to the six schools. Dean Close Services Limited (DCSL) and Dean Close Nurseries Limited (DCNL) are separate business arms of the Foundation and produce their own safeguarding procedures based on those of the Foundation schools. DCNL has a separate Safeguarding policy and DCSL has an appendix attached to this policy

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. Head 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

23. **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 September and ratified by the Board 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. A Nominated Safeguarding Trustee (NST) or a company director with specific responsibility for Safeguarding and Child Protection is appointed for each school within the Foundation as well as DCSL and DCNL. A Trustee or company director is appointed to oversee safeguarding work throughout the Foundation
e. An annual safeguarding review is presented to the Trustee body. This will include a report from each school and DCSL. DCNL will produce its own annual safeguarding review
f. 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
g. DCSL and DCNL will appoint DSLs and DDSLs as appropriate
h. The Trustees with particular responsibility for Safeguarding and Child Protection (NST) 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 at least every three years
i. All other staff are trained regularly in accordance with advice from GSCP, OSCP and other agencies at least every three years or two years for those in EYFS
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. Appropriate IT filters and monitoring for harmful searches are in place that block websites in an age-appropriate way and do not restrict teaching and learning
m. All Trustees comply with their duties under legislation
n. Trustees are aware of their obligations under the Human Rights Act 1998 and the Equality Act 2010
o. 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
p. 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
q. The Foundation schools have an appropriate Child Missing from Education policy in place.

24. **The role of the Chair of Trustees**

a. To inform and liaise with relevant external agencies if there is an allegation against a Head or Warden
b. To ensure that the designated Nominated Safeguarding Trustees are appointed and meet with the appropriate DSL
c. To ensure that all Trustees receive appropriate and regular Safeguarding and Child Protection (including online) training which equips them with the knowledge to provide strategic challenge to test and assure themselves that effective policies and procedures are in place
d. To read and ratify the Safeguarding and Child Protection policy annually and following any significant revisions.

25. **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(s) in each school
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, and

an enhanced certificate with a barred list information is 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.

26. **The role of the Warden (CEO)**
    a. To ensure that the Head in each school monitors the DSL and deputy DSL and that the correct safeguarding procedures are known and understood
    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.

27. **The role of the Designated Safeguarding Lead (DSL)**
    See job description in Appendix A.

The Policy

28. 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.

29. 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 2025)
    b. That it follows guidelines provided by the Gloucestershire Safeguarding Children Partnership (GSCP) Oxfordshire Safeguarding Children Partnership (OSCP) and other agencies
    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 Plan
h. That it recognises and supports vulnerable pupils such as those with SEND, EAL, LGBTQ+, sexual or gender questioning issues, or difficult family circumstances
i. That it offers a coordinated approach to Early Help.

30. 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.

31. This policy is renewed annually by the Foundation's Lead for Safeguarding in conjunction with DSLs and Nominated Trustees to ensure that it reflects current legislation and local GSCP procedures.

In-school Procedures

32. All new staff will receive induction which will include familiarisation with safeguarding procedures and the identity of the DSL and any deputies.

33. All staff receive regular safeguarding training from the DSL, online or through outside agencies. This includes:

a. Identification of safeguarding issues
b. Procedures to be followed as outlined in this policy
c. Other aspects of this policy and others relevant to safeguarding
d. A consideration of other relevant school policies mentioned in this document such as the Child-on-child 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 always available 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 can be contacted
h. Awareness of vulnerable groups, how Early Help is offered and the possibility of Child-on-Child abuse.
i. An awareness of the online filtering and monitoring procedures in place and an awareness that some pupils may have unrestricted access to the internet via mobile networks and 5G
j. Consideration of scenarios relevant to each school.

34. All staff can identify the DSL and deputy DSL to whom they have ready and confidential access.

35. All staff must declare on an annual basis to say that they have read:

a. KCSIE Part One (or Annex A). The DSL will inform staff of any changes that occur during the year
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 or two years for EYFS
g. Successfully completed Prevent training.

36. Staff will receive regular safeguarding updates as required but at least termly.

37. 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.

38. All staff must be aware that pupils may be able to access unfiltered or monitored information via mobile networks which may be inappropriate or may be used to sexually harass, bully, control others, share indecent imagery, or to view and share pornography or be exposed to other harmful content.

39. The Visitors and Visiting Speakers Policy (W034) outlines the procedures that should be followed when inviting a visitor or person to speak to pupils including the completion of a NEON form in advance of the visit. A member of staff should be present whilst the speaker is in contact with pupils to monitor content for safeguarding or counter-terrorism concerns.

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

40. When an issue of a safeguarding nature arises, it may be decided that it doesn't meet the threshold for a referral to statutory services, but the pupils involved may benefit from Early Help. Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse.

41. 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 or has certain health conditions and has specific additional needs
    b. Has special educational needs (SEND or EAL) whether or not they have a statutory Education, Health and Care plan
    c. Has a mental health need
    d. Is a young carer
    e. Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
    f. Is frequently missing or goes missing from education, home, or care
    g. Has experienced multiple suspensions or is at risk from being permanently excluded from school
    h. Is at risk of modern slavery, trafficking, and/or criminal exploitation
    i. Is misusing drugs, alcohol, or other substances
    j. Has challenging family circumstances including substance abuse or mental health issues
    k. Has experienced/witnessed domestic abuse at home

l. Is at risk of being radicalised or exploited
m. Has a parent or carer in custody, or is affected by parental offending
n. Identifies as LGBTQ+ or is gender questioning
o. Is in private fostering.

42. 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.

43. 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.

44. All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected and/or they may not recognise the experience as harmful. Children may feel embarrassed, humiliated, or being threatened which could be due to their vulnerability, disability and/or sexual orientation or language/cultural barriers. This should not prevent staff from having professional curiosity and recording concerns.

45. Particular notice should be given to vulnerable pupils and staff need to always be aware of the possibility of Child-on-Child abuse.

46. 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.

47. Staff should not assume that someone else will act so therefore should share information that might be critical in keeping a child safe promptly. This is everyone's responsibility.

48. 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.

49. DSLs run 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 and through much of the holidays.

50. 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 Child-on-Child Abuse Policy (W055*). These policies include:

a. The different forms Child-on-Child 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 Child-on-Child abuse
c. How allegations of Child-on-Child abuse will be recorded and dealt with
d. A clear statement that abuse is abuse and should never be tolerated or passed off as mere 'banter' or 'having a laugh'
e. Particularly in our schools which are co-educational, recognition of the gendered nature of Child-on-Child abuse but be clear that all Child-on-Child abuse is unacceptable and will be taken seriously
f. Clear processes for how victims, perpetrators and any other child affected will be supported.

51. **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 overreact
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, preferably on CPOMS. 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.

52. **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 Child-on-Child 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, Child-on-Child 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 Child-on-Child Abuse policy
d. Behaviour which raises Safeguarding or Child Protection concerns should be referred to the DSL as soon as practicably possible
e. Staff should 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, EAL or LBGT+ for signs or 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. Child-on-Child 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. Pupil Leaders and older pupils with positions of responsibility will receive appropriate Safeguarding and Child Protection training including identification of signs of abuse neglect and exploitation. They will be advised how to take 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.

53. **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 Head or in his or her absence the Warden who will refer to the Chair of Trustees. The Head will inform the LADO. This duty maybe delegated to the DSL
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 they may pose a risk of harm to children
    iv. Behaved in a manner in their private lives that might indicate to above conditions
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 using the Allegations Management process

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. Concerns that do not reach the allegations threshold will be recorded as a Low Level Concern (see Appendix G)
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 will 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. Malicious and unsubstantiated allegations will be removed from staff personal records and will not be referred to in employer references
u. 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)
v. A member of teaching 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'
w. 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.
x. 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.

54. **Procedure for when an allegation is made against a Head, Warden, or Chair of Trustees**

a. Allegations against a Head or Warden must be reported to the Chair of Trustees who reports it to the LADO within one working day

b. The Head 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.

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

56. 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*
b. *Low Level Concerns (see appendix G)*
c. *Acceptable Use of Information Technology for Staff Policy (W056)*
d. *Anti-Bullying Policy (W045)*
e. *School Behaviour Policies*
f. *Complaints – Students and Parents Policy (W007)*
g. *Recruitment Process Policy (W041)*
h. *Youth Produced Sexual Imagery Policy (W051)*
i. *Child-on-Child Abuse Policy (W055)*
j. *Whistleblowing policy (W035)*
k. *Confidentiality and Information Sharing Policy (W066).*

Confidentiality and information sharing

57. 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.

58. 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.

59. Safeguarding and Child Protection records should be kept on the secure CPOMS data base. If paper records are kept, they should be carefully kept in a locked facility by the DSL with limited access. 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

60. 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 SCP approved and may consist of completing an online course (Educare), training delivered by the DSL or training delivered by a SCP or another outside agency. This includes the Head of each school, Warden, and Trustees.

61. 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 (or Annex A).

62. The Foundation's Staff Code of Conduct gives 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. This includes appropriate use of mobile phones and other devices including cameras. Staff should only take photos of pupils for school use on school devices. Staff in EYFS and EYFS settings have separate guidance, please see DCPPS Mobile Phone and Camera Policy (PP312) and Dean Close Airthrie School: Acceptable Use Policy and Staff Agreement (AS013) May 2021.

Safer recruitment

63. All staff recruitment at a Foundation school is informed by part 3 of KCSIE and 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings'.

64. 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.

65. As part of due diligence, online searches will be carried out for shortlisted candidates, when possible, prior to interview.

66. Where possible, references will be obtained for shortlisted candidates prior to interview

67. A Single Central Record (SCR) of employment within the Foundation is compiled and updated by the Human Resources department in the Bursary and reviewed regularly by Nominated Safeguarding Trustees and senior staff.

68. 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

69. Key elements of Safeguarding and Child Protection are incorporated into the curriculum at age-appropriate levels. Issues such as appropriate relationships, bullying, online safety, personal safety, and mental health are primarily taught in PHSE lessons although they also form part of the Science, RS English, and other 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 Foundation to discuss age-appropriate issues relevant to Safeguarding and Child Protection.

70. 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)). Staff are aware that pupils may be able to access unfiltered and unmonitored online content through mobile phone networks.

71. 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.

72. The PSHE programme will ensure that pupils are aware of other types of abuse, neglect and exploitation as outlined in this document, at the age-appropriate level. They will be encouraged to report any concerns.

73. The tutorial and other pastoral programmes are 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. Senior pupils receive Safeguarding and Child Protection training as appropriate.

74. RSHE is taught in all Foundation schools, following current guidance, at an age appropriate level. Parents are informed of the content of RSHE lessons and have the opportunity to withdraw their child from certain lessons if required.

75. The Foundation is committed to safeguard all pupils from potentially harmful and inappropriate online material. Regular training ensures that pupils are aware of potential dangers and risks within the following categories:

    a. **Content**: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
    b. **Contact**: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
    c. **Conduct**: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and
    d. **Commerce**: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

76. 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, gambling, and the sale of illegal substances **cannot** be accessed via any school Internet. Pupils receive guidance on accessing such sites through their own electronic devices and mobile networks.

77. Internet usage is monitored throughout the Foundation. Attempts to access banned or unsuitable sites is generate alerts and patterns of online behaviour are observed.

78. Where remote teaching and learning is necessary, pupils and staff will be advised on the correct protocols and how to report issues of concern (see appendix C).

79. All Foundation staff should have an awareness of safeguarding issues that can put pupils at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable or persistent absences from school, serious violence, radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or images can be signs that pupils are at risk.

Signs of abuse

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

81. All Foundation staff should be aware of the indicators of abuse, neglect and exploitation and understand that pupils can be at risk of harm inside and outside of school, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse, neglect, and exploitation so that pupils who need protecting can be supported.

82. Staff are aware that abuse can take place wholly online, and that technology can be used to facilitate abuse face-to-face.

83. Part one of KCSIE defines abuse and gives details of the four broad categories of abuse.

84. **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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This is particularly relevant in relation to the impact of domestic abuse including where they see, hear, or experience its effects. Children may be abused in a family, the community, an institutional setting by someone known to them, or more rarely by others. 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.

85. **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.

86. 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.

87. 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.

88. **Emotional abuse:** This is persistent emotional maltreatment, which is likely to cause serious and adverse effects 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 may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploring and learning or preventing the child from participating in normal social interaction. It may involve hearing the ill-treatment of another. It may involve bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

89. 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.

90. A child witnessing domestic abuse and/or domestic violence will be experiencing emotional abuse and possibly other forms of abuse or neglect as well.

91. **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. 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.

92. 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.

93. **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.

94. 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.

95. 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.

96. **Affluent neglect:** this is the neglect experienced in affluent families which could be physical, medical, educational, or emotional. It is important that all staff in Foundation schools are aware that children from affluent families can be subject to abuse.

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

97. **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.**

98. 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.

99. 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.

100. 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.

101. **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.

102. All staff are Prevent trained and can identify children who may be susceptible to radicalisation and know what to do when they are identified. Staff know to be aware of changes 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.

103. 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.

104. 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 and/or
b. For the financial advantage or increased status of the perpetrator or facilitator.

105. 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 Child-on-Child abuse. **Child Sexual Exploitation is illegal in the UK.**

106. 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.

107. 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.

108. 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.

109. Domestic abuse can encompass a wide range of behaviours and can be a single, or a pattern of incidents. Children can be victims of domestic abuse as they may see, hear, or experience the effects of abuse at home or suffer domestic abuse in their own intimate relationships.

110. 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.

111. 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.

112. There was a dramatic increase in Domestic Violence during the lockdowns of the COVID pandemic, so all staff need to be aware of the ongoing consequences of this.

113. **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.** If forced marriage is suspected 'Multi-agency practice guidelines: handling cases of forced marriage' should be consulted.

114. **Children missing from education**: A child going missing from education is a potential indicator of abuse or neglect, involvement in County Lines, 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 act accordingly by following the Child Missing in 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.

115. Children who are persistently absent from school may be suffering abuse or neglect and need to be supported to prevent them becoming children missing education in the future. 'Working together to improve school attendance' provides guidance on reducing persistent absence.

116. **Child-on-Child 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.

117. 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 Child-on-Child abuse will be taken seriously and investigated in line with the Child-on-Child Abuse Policy (W055).

118. **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.

119. 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.

120. 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. Challenging misogynist behaviour and referral to current online trends
e. The understanding of consent and whether it has been freely given.

121. **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. **Upskirting is illegal in the UK**

122. The Foundation will take any allegation of upskirting seriously and will investigate thoroughly. A severe sanction may be given, or the police informed.

123. The Foundation is aware that certain groups of pupils such as girls, SEND, EAL gender questioning and LGBTQ+ are at greater risk of sexual violence and harassment.

124. Child-on-Child 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 Child-on-Child 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.

125. 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.

126. 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. Child-on-Child Abuse *(see Child-on-Child Abuse policy W055)*
n. So called 'honour-based violence'

Mental Health

127. 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.

128. 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. The Health Centre and Wellbeing teams are able to offer advice and support.

129. 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.

130. Pandemic lockdowns caused a significant increase in mental health issues, so staff need to be aware of long-lasting consequences of this and subsequent potential safeguarding issues.

131. 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 paragraphs 51 and 52.

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. To advise staff on pupil use of unfiltered and monitored internet access on pupil personal devices.

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 GSCP 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 can 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 (or Annex A) of KCSIE
    d. The Foundation Whistleblowing policy
    e. Are aware of all other school and Foundation polices concerned with pupil welfare.

7. To provide training and support, on a regular basis, and in accordance with the requirements of GSCP 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 GSCP 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 keep 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 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 GSCP 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 school Head 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 Nominated Safeguarding 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 GSCP guidance.

25. To develop effective links with relevant statutory and voluntary agencies.

26. To ensure that GSCP has access to the School Safeguarding and Child Protection policy and that the policy is published on the Foundation websites.

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 always maintain confidentiality.

29. To identify vulnerable children within the Foundation 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 each school curriculum, appropriate to pupil age.

33. To ensure that all staff are aware of the Child Missing in 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

39. To produce an annual Safeguarding Review to be presented to the Foundation Trustees in June

Appendix B

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 Virtual Learning Environments (VLE) platform set up by the school
    f. Video conferencing packages approved by the school and operated via a school account such as Zoom
    g. Text originating from a school account or phone.

2. The following methods of communication should not be used unless they originate from a school account:

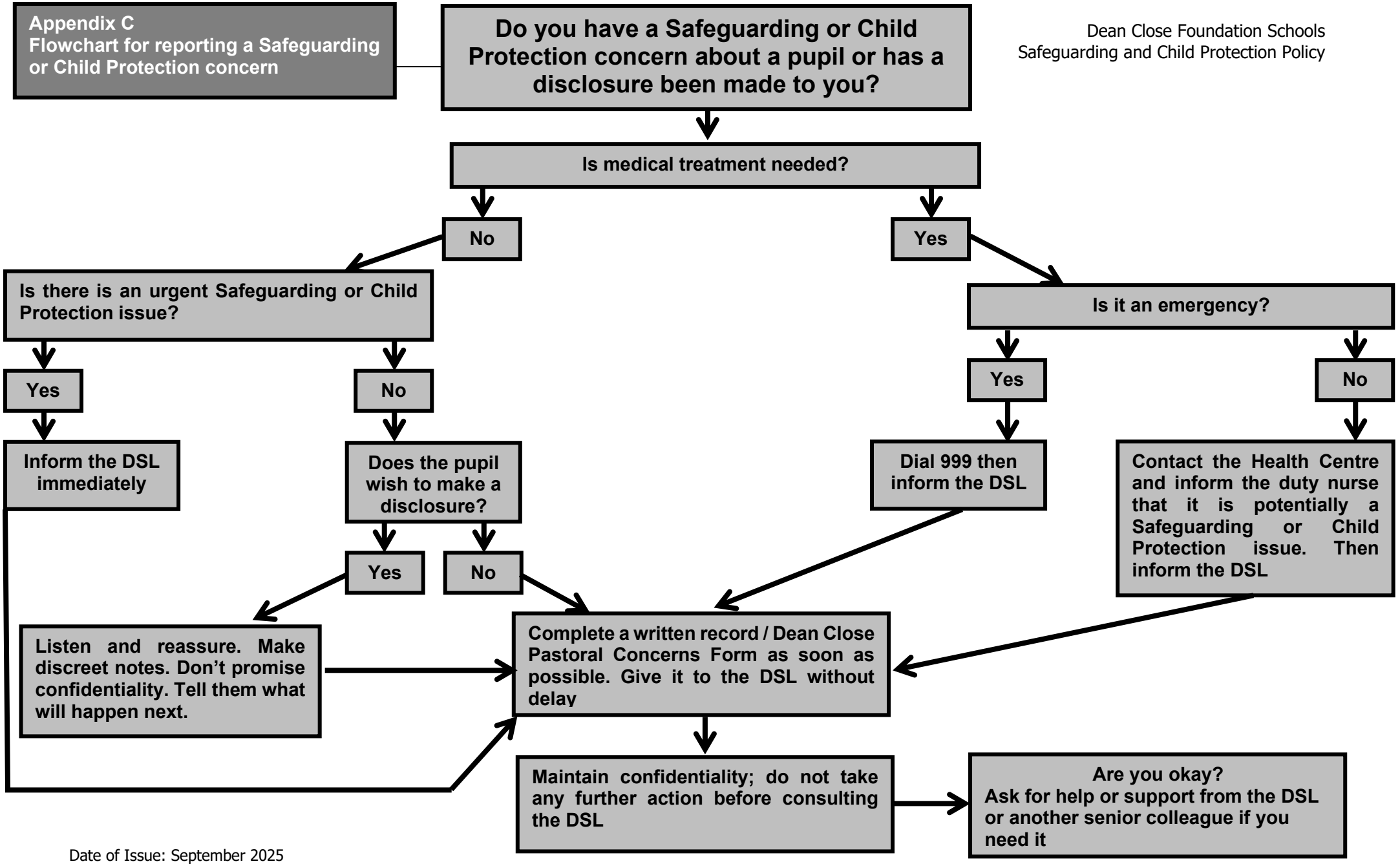
    a. Social media including Snapchat, WhatsApp, and TikTok
    b. Text **not** originating from a school account or phone
    c. Personal email addresses.

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 as a Low-Level Concern.

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 C
Flowchart for reporting a Safeguarding or Child Protection concern



Staff/Volunteer Disqualification Declaration (Appendix D)

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 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		
• Have you been barred from working with children (i.e., does your name appear on the DBS Barring List)?	Yes	No
• 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.

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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.

Signed …….. Date ……

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 E: 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 53 and 54 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 do not meet the allegation thresholds 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
    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 confidential record of Low Level Concerns is kept by the Head of each school. The record includes:

    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 would pose a risk of harm if they work regularly or closely with 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

Appendix G – Safeguarding procedures for Dean Close Services Limited (DCSL)

1. DCSL and the Dean Close Foundation:

a. DCSL is responsible for the commercial use of the Dean Close Foundation facilities, reporting directly to the Chief Financial Officer, Adrian Bowcher (CFOO) and DCSL board.

b. DCSL makes extensive use of Dean Close Foundation premises both in term time and during the holidays and is aware that an incident or concern of a safeguarding nature may occur at any time.

c. The Commercial Director (CD) is the DSL for DCSL; this is Mrs Marie Widdowson. The Deputy DSL for DCSL is Sam Taylor. The Warden has direct oversight of safeguarding for DCSL; the Nominated Safeguarding Trustee (NST) is Brig Matthew Cansdale.

d. The DCSL DSL meets with the Nominated Safeguarding Trustee termly. A checklist is worked through, and the completed document is shared with the Warden, Foundation Safeguarding lead and the lead NST.

2. Safeguarding policy:

a. DCSL adheres to the Foundation Schools Safeguarding and Child Protection Policy and but is aware that some circumstances require slightly different procedures.

b. This appendix details specific procedures to be followed by DCSL.

c. DCSL is aware that an allegation or concern relating to an incident that happens when an individual or organisation is using school premises for the purpose of running activities for children or vulnerable adults must be investigated following the procedures laid out in the policy.

3. **Services and activities under the direct management of DCSL**

a. Services operated directly by DCSL on Foundation premises will adhere to the processes and procedures detailed in the Foundation Schools Safeguarding and Child Protection Policy.

b. DCSL staff are trained in Safeguarding and Child Protection every three years and read this policy annually so are aware of reporting procedures if there is an incident or concern.

c. The DCSL DSL will contact outside agencies as appropriate and record details of the incident or concern as outlined in the policy in a separate secure file. If the DCSL DSL requires extra support, she is able to contact either the Foundation DSL or the Warden.

d. DCSL staff are aware of local multi-agency procedures and how referrals are made to Social Care or the LADO.

e. If the concern or allegation is about a Dean Close Foundation pupil, the DSL from the appropriate school will be contacted and a record made in the school safeguarding files.

4**. Services and activities not under the direct management of DCSL**

a. The Safeguarding Conditions of Hire for individuals or organisations outside DCF are set out in the DCSL Foundation Booking Agreement. These are set out in Figure 1.

b. The Compliance Certificate mentioned in Figure 1 ensures that:
   i. DCSL has assurance from the hirer that they have the appropriate Safeguarding and Child Protection policies and procedures in place where relevant.
   ii. DCSL ensures that the hirer understands its obligation to report concerns about children and vulnerable adults to the DCSL DSL.
   iii. The hirer knows who the DSL is and that any safeguarding concerns, including within their own group, should be reported as soon as possible but at least within 24 hours
   iv. The hirer accepts that the DCSL DSL will act on any report or concern, including reporting to the LADO or Social Care if appropriate.

5. **DCSL recruitment**

a. All DCSL staff including casual zero hours staff, follow the normal recruitment procedures through the Human Resources department including obtaining an enhanced DBS check.
b. All staff complete an online Safeguarding and Child Protection and Prevent course as well as statutory reading which includes KCSIE 2025 part one (or annex A) and the Foundation Safeguarding and Child Protection policy when commencing employment.
c. DCSL staff receive regular Safeguarding updates and refreshers in line with all other Foundation staff.

Figure 1
In DCSL's Booking Agreement & Venue Hire Conditions it states:

4.3 The Hirer shall:
Supervision and safeguarding:

(w) unless otherwise agreed by the Organisation in writing, provide its own staff, appropriate to the Event, such as instructors, supervisors, attendants, leaders and any other staff necessary to run the Event and:

(i) shall, whether or not children are invited to the Event, comply (and ensure such staff comply with) with all applicable laws relating to the provision of such staff including those laws, procedures, codes and principles relating to safeguarding, protection and supervision.

(ii) shall, whether or not children are invited to the Event, comply (and ensure and procure that such staff comply) with any and all policies, rules, codes of conduct of the Organisation [and/or the Foundation] including those relating to safeguarding, protection and supervision (as published on the Organisation's[and/or the Foundation's] website(s), as contained in Schedule 2 and as otherwise notified to the Hirer from time to time);

(iii) shall, whether or not children are invited to the Event, screen and vet such staff, including carrying out all necessary DBS clearance checks, prior to assigning such staff to the Event, and only allow such staff to be assigned to the Event who, in the Hirer's reasonable opinion, pass such screening and vetting checks. The Hirer shall immediately on request provide the Organisation with evidence that such screening and vetting checks were carried out (and the results of such checks [in the form of a recent DBS certificate if required]), in relation to each of its staff assigned to the Event. The Hirer undertakes to inform such staff that the result of such screening and vetting checks will be provided to the Organisation, for data protection compliance. Following receipt of the screening and vetting evidence (or if the Hirer does not provide the evidence in a timely manner), the Organisation may remove or request that the Hirer remove from the Event and the Venue any staff member who, in the reasonable opinion of the Organisation, does not satisfactorily pass the screening and vetting (or where evidence for that member of staff is not received in a timely manner);

(iv) warrants that if any child or vulnerable/ at risk adult is due to attend the Event, the Hirer has appropriate safeguarding and/or child protection policies and procedures in place (in compliance with the Department for Education's guidance entitled 'Keeping children safe during community activities, after-school clubs, and tuition: non-statutory guidance for providers running out-of-school settings') and shall promptly on request provide copies thereof to the Organiser; and

(v) shall where appropriate liaise with the Organisation's representative regarding any safeguarding and/or child protection issue relating to the Event;

SCHEDULE 2 – MANDATORY POLICIES, CODES AND PROCEDURES
(Forms part of the DCSL Hire Agreement Details and Venue Hire Conditions)

- The organisation (Dean Close Services Ltd) has its own Designated Safeguarding Leads (DSL's). These are listed in the Compliance Certificate.

- Hirers must adhere to safeguarding responsibilities as outlined under Supervision & Safeguarding in the Venue Hire Conditions.

  In addition, Hirers must comply with the following mandatory policies, codes and procedures:

  - A **Compliance Certificate** is completed by the Hirer before they are permitted to hire the Facilities, the Organisation must receive written confirmation from the Hirer to this effect.
  - The **Compliance Certificate** confirms:

    - The hirer has complied with its own safeguarding obligations as set out in the Venue Hire Conditions.
      The Hirer and any member of its own staff on Foundation Premises under the terms of this agreement, has read, and will comply with, the Dean Close Foundation Safeguarding Policy; found here www.deanclose.org.uk/policies
      or for Kingham Hill School found here or www.kinghamhill.org.uk/about/school-policies
    - The Hirer and any member of its own staff on Foundation Premises under the terms of this agreement agree to report any safeguarding concerns (irrespective of whether or not it concerns a pupil or staff member of the Foundation) to the Designated Safeguarding Lead (DSL) for the Organisation within 24 hours. The Organisation will decide as to whether the information has any implications for the continuation of the hire and may terminate this contract or impose certain conditions for the continuation of the hire period.
    - The Organisation's DSL may escalate concerns to LADO or MASH/Social Care.
    - The Hirer is responsible for maintaining an up to date list of its own staff that are on Foundation Premises and agrees to provide a copy of the up to date list to the Organisation. The Hirer will inform the Organisation if there is a change in staff.
    - Where the Organisation determines that the Hirer's staff will be undertaking 'regulated activity' as defined by the Safeguarding Vulnerable Groups Act 2006, the Hirer confirms by signing the Compliance Certificate, that an Identity check, Enhanced Disclosure and Barring Service (DBS) check and Right to Work in the UK check, has been undertaken on its own staff on Foundation Premises. The Organisation will request to see the DBS before the Hirer is permitted to hire the Facilities.

- Hirers agree to complete the Acceptable Use of IT for Staff Policy (W056). Issued with the Venue Hire Conditions & Hire Details form.

- Hirers understand that the Organisation will follow the Schools Enterprise Association Safeguarding checklist. (copy can be provided)

- The Hirer understands that the Organisation will Risk Assess the use of site by multiple Hirers and as such the Hirer may have to comply with requests by the Organisation to Safeguard all people on site.

- The Organiser acknowledges that DCSL may verify the identity of the Organiser's staff on their arrival at the School against either a passport or photo card driving licence.