

### **3.6 Child Protection and Safeguarding Policy**

This policy is available to current and prospective parents either via the school website or on request from the School Office. It is written and updated by the Deputy Head, Martin Back who is the Designated Safeguarding Lead, and is reviewed annually by the Head. The Board of Governors also reviews the policy and the annual report on Safeguarding in their Michaelmas Term meeting and this action is minuted. The policy was last revised by Martin Back in August 2019, and was signed off by Nicholas Kaye on 4/9/19.

The Deputy Head can be contacted via [deputyhead@sussexhouseschool.co.uk](mailto:deputyhead@sussexhouseschool.co.uk).

Annabel Abbott is the Deputy DSL and has undertaken the required training for this role.

The Local Safeguarding Children Partnership for Sussex House is the Bi-Borough Local Safeguarding Children Partnership (Royal Borough of Kensington and Chelsea, Hammersmith and Fulham, and City of Westminster).

Hilary Shaw is the Bi-Borough Safeguarding and Education Manager and can be contacted at RBKC. Hilary has been very supportive of the school in providing Safeguarding and Channel training. She can be contacted at [Hilary.Shaw@rbkc.gov.uk](mailto:Hilary.Shaw@rbkc.gov.uk), or on 07817 365519.

Sarah Stalker is our local Family Support and Child Protection Adviser (Mon-Wed only) 020 7598 4640 / 07971 322 482 [sarah.stalker@rbkc.gov.uk](mailto:sarah.stalker@rbkc.gov.uk). Angela Clayton is our local Family Support and Child Protection Adviser (Wed-Fri only) 07807 159 907 [angela.clayton@rbkc.gov.uk](mailto:angela.clayton@rbkc.gov.uk).

For referrals and management of allegations against staff, Sharon Ackbersingh is the Interim Bi Borough Safer Organisation's Manager and Local Authority Designated Officer (LADO) 07714 845 702 [sharon.ackbersingh@rbkc.gov.uk](mailto:sharon.ackbersingh@rbkc.gov.uk).

The local bi-borough Prevent Officer is Samuel Gee. He is our local contact for 'Channel', which is a multi-agency support scheme for those who are identified as being at risk of being drawn into extremism. They offer support and advice in the event of any concerns which may be raised about an individual. In such a case the matter would be handled through the DSL, as per the normal safeguarding procedures outlined in this document. Samuel can be contacted at [samuel.gee@lbhf.gov.uk](mailto:samuel.gee@lbhf.gov.uk), or on 020 8753 5843.

Governors and staff may also use the dedicated DfE *Prevent* helpline: [counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk) Tel. 020 7340 7264

Any queries regarding safeguarding of children can also be made to the Royal Borough of Kensington and Chelsea's Family and Children's Services Branch (Tel: 020 7361 3009 or e-mail: [education@rbkc.gov.uk](mailto:education@rbkc.gov.uk)).

Staff with concerns about colleagues should refer to the Whistleblowing Policy in the first instance but may subsequently wish to consult the NSPCC Whistle-blowing Helpline (Tel. 0800 028 0285).

Our local contact for matters regarding 'looked after children' is Matthew Blood ([matthew.blood@westminster.gov.uk](mailto:matthew.blood@westminster.gov.uk)).

### **3.6.1 Aims of the Policy**

Sussex House School fully recognises its duty of care towards all its pupils. Its statutory duties are set out in:

- The Children Act (1989)
- the 1996 Education Act
- the 2002 Education Act
- the Childcare Act (2006)
- the Early Years Foundation Stage Statutory Framework (May 2008)
- the Anti-terrorism and Security Act 2015
- Working Together to Safeguard Children (July 2018)
- Keeping Children Safe in Education (September 2019).

This policy is based on those documents and interprets their requirements in the context of Sussex House. Safeguarding matters are also addressed in the Staff Code of Conduct (Handbook section 1.7.1), the Whistleblowing Policy (Handbook section 1.8) and the Recruitment Policy (Handbook section 1.6). While setting out current aims and procedures, the Policy is annually reviewed and may be revised in the light of changing circumstances.

The school follows approved safeguarding procedures and works closely with the Bi-Borough Local Safeguarding Children Board. We also participate in inter-agency safeguarding forums which may include Social Services and the Police. The RBKC Local Authority Designated Officer (LADO) is also available for support and information in safeguarding matters, outside of specific cases.

At Sussex House we aim to:

- have an atmosphere where children feel secure and are listened to and valued.
- have a range of adults whom children can approach for help, from administrative staff, through to the Head, who are able to recognise the signs and symptoms of suspected abuse.
- have clear procedures and lines of communications.
- have close relationships with parents and Safeguarding agencies.
- have close monitoring of children at risk.
- use some lesson time to raise children's awareness of Safeguarding and Protection matters and build their confidence.
- contribute to inter-agency working on Safeguarding matters, including the 'Prevent Duty' and Early Help.
- employ specialist providers to provide dedicated lessons on e-safety

All staff should be alert to the possibility of signs of abuse by a parent, sibling, other relative, carers, acquaintances, peers or strangers and report their suspicions however tenuous to the Head. The protection of the child must take precedence over the rights of the parents and the welfare of the child must be the paramount concern.

Should any member of staff become aware of deficiencies or weaknesses with the school's Child Protection procedures, they should be immediately raised with the Designated Safeguarding Lead (DSL), who will then remedy such deficiencies without delay.

### **3.6.2 Types of abuse and neglect**

The following descriptions are taken from 'Keeping Children Safe in Education September 2019':

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family

or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

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

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

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or 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 offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

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

### ***3.6.3 Specific Safeguarding Issues***

Annex A of KCSIE 2019 outlines several specific safeguarding issues. Staff training and our pastoral systems ensure that the indicators of such issues can be identified early, and an appropriate course of action taken.

#### **Children and the Court System**

KCSIE refers to children being required to give evidence in court and the school recognised this would be a very stressful scenario. In such a case staff would be made aware of the matter and asked to be especially vigilant in monitoring the well-being of the child. The

schools Learning Support facilities now include a trained counsellor and she could be used to support a pupil in need. Alternatively we have a number of external professionals who we can refer to, to provide support for pupil's well-being.

### **Children Missing from Education**

We monitor pupil absence closely through the registration system and follow up any absences promptly. Whilst the nature of our school means we have not experienced CME pupils, we have close links with relevant personnel at RBKC to consult in such matters. Any withdrawals of boys generate a reference request from the school to which they are transferring and we report any students leaving for whom this is not the case, to the RBKC.

### **Children with family members in prison**

Should any pupil experience the incarceration of a family member, they would be subject to enhanced monitoring and support from the pastoral staff of the school. Should it be deemed helpful we would offer counselling, and the Headmaster would exercise understanding when dealing with requests for absence to visit the family member.

### **Child sexual exploitation**

Staff are aware to watch out for signs of possible sexual exploitation as outlined in KCSIE 2019 and reinforced in their training. Any staff with concerns should take the matter to the DSL, who will (if relevant) contact the police and the LSCP. During the annual cyber safety training and through the PSHE programme, boys are given age-appropriate advice regarding keeping themselves safe.

### **Child criminal exploitation: county lines**

Whilst the general profile of Sussex House boys would not suggest they were especially vulnerable to this issue, staff are nonetheless made aware to watch for signs such as marked changes in behaviour, signs of physical abuse or the sudden and untypical appearance of valuable personal items. Should grounds be sufficient the DSL will consider a referral to the National Referral Mechanism, as per KCSIE 2019.

### **Domestic abuse**

As with other forms of abuse, staff are trained to identify signs and raise concerns with the DSL. RBKC Family services are an invaluable partner in addressing such matters.

### **Homelessness**

In the event of homelessness becoming an issue for a pupil the school would offer support in conjunction with the Local Housing Authority. Fee assistance will be considered on a case by case basis and emotional support for the pupils is available in school.

### **So-called 'honour-based' violence, FGM and Forced Marriage**

Whilst FGM and Forced Marriage have limited relevance to our all-male student body, staff are aware of the issue and seek to educate boys (on an age-appropriate basis) about these problems.

### **Preventing radicalisation**

The school's PSHE programme covers relevant topics from the Prevent duty and staff are aware of their obligations under the same act. Sussex House promotes British values in a range of ways, including its Church of England affiliation, visits to the Houses of Parliament and education to enable understanding of political issues.

### **Peer on peer abuse**

Peer-on-peer abuse is a possibility and may exceed the compass of the Bullying Policy if a child is felt to be suffering, or likely to suffer, significant harm. In such a case both abuser and abused would be considered 'at risk' and would be referred to the local agencies as per this policy. It is recognised by the school that some pupils with SEN/D are particularly vulnerable to peer-on-peer abuse and staff are aware to watch out for this.

The school seeks to minimise the risk of such abuse within the terms of its Bullying Policy, and any allegations of conduct of this type will be investigated and dealt with according to our published procedures. Any pupil perpetrating actions which meet the threshold for Safeguarding is deemed to be in need of support and their conduct may be indicative that they themselves are victims of abuse.

The school does not tolerate abuse in any form, and peer-on-peer abuse will not be dismissed as 'banter', 'just having a laugh' or 'part of growing up'.

KCSIE 2019 suggests some forms that peer-on-peer abuse can take as follows:

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

(KCSIE 2019)

In the broader context the school recognises the gendered nature of Peer on Peer abuse and seeks to make boys aware of their role in avoiding such behaviour through the PSHE programme and in day to day interactions; courtesy, kindness and consideration for others are promoted at all times.

The following measures against peer-on-peer abuse are taken from the school's Anti-Bullying Policy:

### **Sexual violence and sexual abuse between children**

As with all forms of abuse, staff are trained to look for signs and to report concerns to the DSL. Pupils should not be allowed to feel they are creating a problem in reporting matters of sexual violence or harassment, and staff should follow the guidelines in section 3.6.5.7 below when recording the disclosure.

Whist upskirting will no concern our pupils as victims, we seek to make our pupils aware of the crime and to avoid such behaviours (as all criminal activity!).

### **Serious Violence**

Staff should be aware of indicators which might suggest children are involved with serious violent crime or gangs. Changes in behaviour of friendship groups, a significant decline in performance, signs of self-harm or other loss of wellbeing may indicate this

### **Off-site Safety**

Use of local outdoor facilities and the Annex necessitate boys being taken where they could encounter members of the public. No boys are allowed to go either to or from the annex without adult supervision and classes (or individuals / small groups) are easily monitored in the short distance involved (with appropriate safety measures taken when crossing Claborn Mews). The activities in our local outdoor facility are by arrangement with the management company only and centre mostly on the pre-booked use of the tennis court, which is an enclosed space. The boys are escorted and monitored by a member of staff at all times.

### **3.6.4 Preventative Measures**

We take the following preventative measures:

- We use appropriate Assemblies to explain the school policy on bullying. Our PSHE programme is structured to give pupils an awareness of their social and moral

responsibilities as they progress through the school. The programme is structured to enforce the message about community involvement and taking care of each other.

- Other lessons, for example English and RS, highlight the issue of bullying and reinforce this message by teaching moral and spiritual values that show bullying to be unacceptable and by developing social skills.
- All our pupils are encouraged to tell a member of staff at once if they know that bullying is taking place. The member of staff should then report the matter to the Deputy Head.
- All reported incidents are recorded and investigated at once. We always monitor reported incidents. The record of such incidents is maintained by the Deputy Head, who is responsible for monitoring and identifying any patterns or trends in bullying.
- We have a strong and experienced pastoral team of Form Teachers and subject teachers who support the Deputy Headmaster and are trained in handling any incidents as an immediate priority and are alert to possible signs of bullying.
- Our pastoral team gives support guidance and training to other staff on handling and reporting incidents, and on the follow-up work with both victims and bullies.
- The School Chaplain will give support and guidance to pupils of all faiths who may refer themselves to him, perhaps at a time of family break-up, sickness or bereavement. The Chaplain will provide confidential advice and seek to encourage the development of tolerance, understanding and respect for others in a multi-faith community.
- Staff, supported by members of the 6<sup>th</sup> Form, are always on duty at times when pupils are not in class and patrol the school site. They are trained to be alert to inappropriate language or behaviour.
- Our notice board displays advice on where pupils can seek help, including details of confidential help lines and web sites connecting to external specialists, such as Childline.
- All pupils have access to the School Office telephone, enabling them to call for support.
- We will always investigate incidents that take place outside school hours, on school visits and trips and that occur in the vicinity of the school, involving our pupils. The school takes its 'in loco parentis' duty very seriously.
- The whole school community (staff, parents and pupils) acknowledge a duty to uphold anti-bullying measures both in and out of school, guided by the school's published procedures.
- We welcome feedback from parents and guardians on the effectiveness of our preventative measures.

### **3.6.5 Signs and symptoms of abuse**

#### **Bruises**

Symmetrical black eyes are rarely accidental unless they occur with a fracture of the head or nose. It is uncommon for accidental bruising of the following:

- back of legs, buttocks (except, occasionally, along the bony protuberances of the spine)
- mouth, cheeks, behind the ear (symmetrical bruising of the ears would be most unusual)
- stomach, chest
- under arm
- genital, rectal area. (but be aware accidents can happen when learning to ride a bicycle and on climbing frames etc.)

Most accidents produce one bruise on a single surface. Most accidental bruises on children are on their front.

Be aware of:

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- outline bruising, etc., belt marks, hand prints  
linear bruising, particularly on the buttocks
- bruising on soft tissue with no obvious explanation.
- different age bruising (especially in the same area, e.g. buttocks).

#### Bites

Human bites are oval or crescent shaped. If the distance is more than 3cm across they have been caused by an adult or an older child with permanent teeth.

#### Burns

It is very difficult to distinguish between accidental and non-accidental burns. It is suspicious if burns are of a uniform depth over a large area and if these are splash marks above the main burn area, which would be caused by hot liquid being thrown.

#### Fractures

The most common non-accidental fractures are to the long bones, arms, legs and ribs.

#### Emotional abuse.

These are difficult but behavioural symptoms that generate from this can be:

- excessively clingy or attention-seeking behaviour
- low self esteem
- apathy
- being withdrawn
- constantly seek to please
- over-familiarity and readiness to relate to anyone.

#### Sexual abuse

This often presents itself in a veiled way. Physical evidence is less likely than in other forms of abuse. The following signs ought to be taken seriously:

- injuries in the genital area
- infections or abnormal discharges in the genital area
- sexual awareness or knowledge of sexual matters not appropriate to a child's age and development
- sexually provocative behaviour
- an allegation by a child that he has been sexually exploited.

Parental responses which might be cause for concern if they:

- delay seeking medical treatment
- are unaware or deny any injury
- have inappropriate or varying explanations of any injury
- have over-hasty or violent reactions to a child's naughty or annoying behaviour.

### **3.6.6 Prevent Duty**

The management and staff of Sussex House are aware that pupils could be exposed to extremist ideology. This can hinder their social development and educational attainment alongside posing a very real risk that they could support or partake in an act of non-violent or violent extremism. To this end the school acknowledges its 'Prevent Duty' responsibilities under section 26 of the Counter-Terrorism and Security Act 2015, through our Safeguarding practices, our Internet security and safety measures, and our PSHEE programme.

We are proud to 'promote British values' and do so not least through our affiliation with the Church of England and a range of curricular visits and extracurricular activities such as concerts, theatrical performances, architectural field trips.

### **3.6.7 Procedure at Sussex House**

#### **3.6.7.1 Designated Safeguarding Lead**

The Deputy Head is the Sussex House Designated Safeguarding Lead (DSL) and Annabel Abbott is the Deputy DSL. They have been fully trained for the demands of this role, broadly described in Annex B of *Keeping Children Safe in Education September 2018* as follows:

#### **Managing referrals**

- Refer all cases of suspected abuse to the local authority children's social care as required;
- Support staff who make referrals to local authority children's social care;
- Refer cases to the Channel programme where there is a radicalization concern as required;
- Support staff who make referrals to the Channel programme;
- Refer cases where a person is dismissed or left due to risk / harm to a child to the Disclosure and Barring Service as required; and
- Refer case where a crime may have been committed to the Police as required.

#### **Work with others**

- Liaise with the headteacher or principal to inform him or her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- As required, liaise with the 'case manager' (as per Part four) and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member)
- liaise with staff (especially pastoral support staff, school nurses, IT Technicians, and SENCOs or the named person with oversight for SEN in a college) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies
- act as a source of support, advice and expertise for all staff.

#### **Training**

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.

The designated safeguarding lead should undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to, and understands, the school or college's child protection policy and procedures, especially new and part time staff;
- are alert to the specific needs of children in need, those with special educational needs and young carers;
- are able to keep detailed, accurate, secure written records of concerns and referrals;

- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college;
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

### **Raising Awareness**

The designated safeguarding lead should ensure the school or college's policies are known and used appropriately:

- The designated safeguarding lead should ensure the school or college's child protection policies are known, understood and used appropriately;
- Ensure the school or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this; and
- Link with the local LSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

### **Child protection file**

- Where children leave the school or college ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained.

### **Availability**

- During term time the designated safeguarding lead (or a deputy) should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, it is a matter for individual schools and colleges, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and or Skype or other such mediums is acceptable.
- It is a matter for individual schools and colleges and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

KCSIE September 2019, Annex B

The DSL attends courses with other child support agencies to ensure that he remains conversant with best practice and that our policies and procedures are relevant and up to date. He receives refresher training every two years from the Royal Borough of Kensington and Chelsea that covers child protection, the Prevent duty and inter-agency working (most recently in July 2018), and maintains close links with the Local Safeguarding Children Board (LSCP) for the Royal Borough of Kensington and Chelsea. He has completed the

NSPCC 'Safer recruitment in Education' training and forms part of the interview panel for new staff. He has also completed *Prevent* duty and *Channel* training conducted by RBKC.

The School Governor with responsibility for Safeguarding is Mrs Nicky Gayner. Her task is to assist in monitoring and reviewing the policy and its implementation, to advise the Head on any matters needing immediate attention and to liaise with the Chair of Governors, when necessary. She is also required to liaise with the local authority on issues of Child Protection, or in case of allegations against the Head or one of the governors.

The governing body undertakes an annual review of the school's safeguarding policies and procedures and of the efficiency with which the related duties have been charged in the Michaelmas term.

During induction for new staff the Deputy Headmaster will review best practice of Child Protection and Safeguarding with the employee. This will happen in the first week and will cover four key documents:

- Part 1 of 'Keeping Children Safe in Education' September 2019
- Annex A of 'Keeping Children Safe in Education' September 2019
- The school's Safeguarding Policy
- The school's Whistleblowing Policy
- The school's Code of Conduct
- The name of the Designated Safeguarding Lead (DSL).

Staff receive refresher training from the Bi-Borough Safeguarding Team every three years (most recently in the 2019 Lent term) and from the DSL at the start of the academic year. The DSL also updates staff ad-hoc on current cases on a 'need to know' basis.

Pupils are also trained in how to keep themselves safe, both as part of the PSHE programme and through dedicated events commissioned by the school and run by the NSPCC (personal safety), Childnet (Lent term 2019) (cyber safety) and the Quilliam Foundation (3/11/15) (Extremism).

#### 3.6.7.2 Early Help

In some cases 'Early Help' may be a preferred course of action. In such situations parental consent is obtained prior to contact with the LSCP and all parties work together to resolve the situation. The threshold for such a course is outlined in a bi-borough policy document. Matters exceeding the threshold do not require parental consent for referral. **If a child is in immediate danger or is at risk of harm a referral should be made (according to the published procedure) to children's social care and / or the police immediately.**

#### 3.6.7.3 Action when abuse suspected or disclosed

Whenever any member of staff has reason to suspect that a pupil may have suffered abuse or has a disclosure of such abuse made by the pupil to him or her, then it is the duty of that person to report the matter immediately and in complete confidence to the DSL and the Head.

Where it is clear that a pupil is being bullied by another pupil or by a group of pupils, action will be taken by the school according to the procedures set out in the Anti-Bullying policy. If it is alleged or known to be the case that a pupil is being abused by another pupil or pupils, or by any adult, inside or outside the school, the Head will request a written statement of the circumstances that give rise to the suspicion, in consultation with the DSL, and, where it is helpful other agencies, including the nominated governor and the

School Doctor, will judge how to proceed. All allegations of child abuse which fall within the categories described will be reported immediately (within 24 hours) to the designated officer of the local authority (Royal Borough of Kensington and Chelsea) and / or the police if a crime is suspected. **It must be emphasised that it is not the school's responsibility to investigate the reliability of allegations of this kind, and that there is no requirement to refer to either the child or their parent when raising a matter with the local authority.**

It is understood that there is a difference between safeguarding children who have suffered or are likely to suffer significant harm, and those who are in need of support from one or more agencies. The former are reported to RBKC Children's Social Care immediately, while the latter can be addressed via inter-agency assessment using local processes.

It is also understood that pupils with Specific Needs may be more prone to abuse (for example students with hearing impairment or with other communication difficulties). To this end all staff are aware of such pupils and are especially vigilant for signs of abuse

Parents, pupils and others may approach the local authority. Contact details are given above.

Records should be made as soon as possible of what the child actually says and what the signs of injury are. Relevant records must be maintained in the strictest confidence. Information relating to actual, alleged or suspected child abuse is exempt from provisions regarding the disclosure of pupil records.

The DSL would expect to be invited to the initial case conference and any preliminary planning meetings of the Social Services.

#### 3.6.7.4 Allegation made against a member of staff

The staff Code of Conduct (section 1.7.1) has been written to ensure both students and staff are protected from potential allegations or harm, and staff are advised to consider the code's advice at all times. If an allegation of abuse is made against a member of staff or other employee of the school, or a person working as a volunteer at the school, a written statement of the nature and circumstances of the alleged abuse should be agreed and signed by the pupil concerned under the supervision of the DSL, who will then inform the Head. This statement must NOT be written by the pupil. If there is a threat of serious harm to the pupil the matter will be referred immediately to the RBKC LADO. If the allegation is not a safeguarding matter, it may become one of staff discipline and will be referred through the nominated governor and the Chairman to the governing body, but the school will not investigate any matter without prior consultation with the LADO. The employee may be suspended from service (on full pay) while the issue is considered and will be entitled to legal representation.

There are restrictions on the reporting or publishing of allegations against teachers and so the school must make every effort to maintain confidentiality and guard against unwanted publicity. These restrictions apply up to the point where the member of staff is charged with an offence, or the DfE/TRA publish information about an investigation or decision in a disciplinary case.

If a member of staff is dismissed (or would have been dismissed if they had not resigned) as a result of safeguarding concerns, the school has a duty to report the matter to the Disclosure and Barring Service (DBS) within one month, and to consider making a referral to the Teaching Regulation Agency (TRA). The reason such action 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'.

In the event of allegations about staff being found (after full investigation) to be falsely made and with malicious intent, the pupil will be subject to disciplinary proceedings from the Headmaster as per the Behaviour and Sanctions Policy (Handbook section 3.4)

#### 3.6.7.5 Allegation made against the DSL

Should an allegation be made against the DSL, the member of staff receiving the allegation should immediately inform the Governor responsible for Safeguarding (Nicky Gayner). If the Governor is absent, the information must be passed on to the Chair of Governors. They will receive any written statements and take responsibility for the subsequent process. In cases of this nature, the matter will be reported within 24 hours to the designated officer of the local authority. No formal investigation will take place without prior consultation with the LADO. The RBKC Local Authority Designated Officer (LADO) for Sussex House is Sarah Stalker (07971 322482).

#### 3.6.7.6 Allegation made against the Head

Should an allegation be made against the Head, it should be reported to the Governor responsible for Safeguarding (Nicky Gayner) who will pass this directly to the Chair of Governors. He will receive any written statements and take responsibility for the subsequent process. The matter will be reported within 24 hours to the RBKC and no formal investigation will take place without prior consultation with the LADO.

#### 3.6.7.7 Guidelines on what do to do if you suspect a child has been abused or is at risk

It is important to listen to and reassure that child. Get as much information as you can **without appearing to interrogate them**. Then make careful notes of what was said, **devoid of opinion, suspicion or speculation**, and speak immediately with the DSL.

**Say nothing to the parent/ carer at this stage, unless the information comes from them.**

**Listening to young people** – these skills are based on basic counselling techniques:

You should minimise what you say, allowing the pupil to tell his story without being silenced.

**Acceptance** – listen to what you are being told without displaying your own feelings. **You** do not need to decide if the story is true or not. Do not make notes in the presence of the child.

**Confidentiality – Never promise confidentiality.** Be prepared for this request and prepare your response in advance, e.g. "I am only too ready to listen but at this point I can't promise confidentiality..."

**Reassurance** – Acknowledge their courage in telling you but do not say, "It will be OK now." And do not apportion blame to anyone.

**Questioning** – Ask as few questions as possible. Ensure that your questions are open-ended and not leading, e.g. "Did your step-father do this?" (*Leading*) "Do you want to tell me who did this?" (*Open-ended*). Avoid asking for details that you, as a teacher, do not need to know. Clarify what has been said. If necessary reflect back what has been said to give the young person an opportunity to correct you. Never ask the pupil to write down details in an abuse situation – it could be used as evidence in a police investigation. Leave that to the police.

**Explaining** – You should explain what you will do with this information (i.e. refer it to the DSL who may then take it further).

**Recording** – Make notes as soon as possible after the interview. Include date, time and place, and who was present. Record verbatim whatever phrases you can recall the child using. Describe the observable behaviour (e.g. crying). Do not tape the interview.

**Support** – Think about what support is necessary for the pupil.

You should refer the matter to the DSL immediately. Staff will not be held personally liable if their concern proves unfounded. In this situation the member of staff was reporting a concern, not making an accusation. Following a referral the DSL will inform the member of staff what the outcome is.

#### 3.6.7.8 Staff / Pupil Relations

Staff will be well aware that cases of child abuse have become more numerous and more widely reported and that in their wake has been a plague of malicious allegations and threats. In a litigious and sensation-seeking age, colleagues are advised to exercise care and discretion in the way that they handle staff/ pupil relations. It is essential that pupils at Sussex House should continue to feel comfortable and secure in their relationships with members of staff. Actions which pupils may interpret as improper are unacceptable, no matter how good the intention. To this end the following guidelines are recommended:

**Individual interviews with pupils** - One to one interviews in closed rooms should only take place during times when the immediate vicinity is well populated and as part of a general programme of activities. To carry out such interviews outside the normal school day or rehearsal/ practice schedule could cause anxiety to pupils and could place a member of staff in a compromising situation. If it is anticipated that that an interview maybe prove confrontational, the presence of a second adult is prudent.

**Transport of pupils** - Colleagues should not give lifts in their cars to individual pupils unless the parents provide a letter giving express permission for this. In such cases children should be seated in the rear of the car.

**Home visiting** - Colleagues should not visit pupils at home unless a parent is present. Colleagues should not invite pupils to their home alone.

**Outings** - Colleagues should not take individual pupils on any outings.

**Social Media** – It is not appropriate for staff to be linked to current pupils via a social media platform. Care should be taken when linking with former students to ensure that current students who may also be connected to the former student cannot gain access to staff media.

**Technology** – It is not appropriate for colleagues to be in regular direct contact with pupils via email, telephone, texting or other forms of messaging. Any information that needs to be conveyed should be done so via parents.

#### 3.6.7.9 External speakers

External speakers invited in to the school will be vetted to ensure they do not present extreme or offensive views to the students, and they will be supervised at all times whilst on school premises. The extent of that supervision will be at the professional judgement of the headmaster.

### **3.6.8 Safe Appointments, Staff Induction and Training**

## Introduction

We believe that a comprehensive induction programme helps all of our new members of staff to settle into Sussex House as quickly as possible, and to start to make an effective contribution. Every new member of staff is given an induction programme that is tailored to his or her roles and responsibilities. All new teaching staff are allocated a mentor in their first year, whose role is to provide informal support and assistance. All staff who were teaching in the academic year 2015/16 received training on Safeguarding and Child Protection on 22<sup>nd</sup> or 31<sup>st</sup> January 2019 from Hilary Shaw, Royal Borough Kensington and Chelsea. This training will be renewed in 2022.

### 3.6.8.1 Safe Recruitment

The Acts lay down the checking procedures for the appointment of all staff who have significant contact with pupils, teaching and non-teaching, permanent or temporary, full or part-time. In addition to those areas of school life which are integral to the school day the Acts explicitly include those related to out of school activities and trips during the holidays. The Deputy Head has completed the NSPCC 'Safer Recruitment in Education' training and is a member of the interview panel for new staff. The current Bursar has also completed this training.

To this end the School has put in place safe recruitment procedures for all staff directly employed by Sussex House and updates these in light of changing legislative requirements, such as the introduction of the Safeguarding Agency. The school's Recruitment Policy can be found in the Staff Handbook, section 1.5. Before employment is confirmed, all staff are checked for their suitability to work with children through the Disclosure and Barring Service at Enhanced Level. All referees are asked to confirm that they know of no reason why a candidate should not work with children under the terms of the Children Act, and they are asked to complete a declaration of mental and physical suitability for their post.

Third party organisations (such as activity centres) who undertake Regulated Activity on behalf of the school are required to confirm in writing their staff have satisfactorily undertaken the required safeguarding checks.

The School is required to report to the DBS (and the TRA for teaching staff) within one month of leaving the school any person (whether employed, contracted, a volunteer or a student) whose services are no longer used because he or she is considered unsuitable to work with children. Such reports will include as much evidence about the circumstances of the case as is possible. The address for referrals is The Disclosure and Barring Service, P.O. Box 181, Darlington, DL1 9FA; telephone 0300 0200 190.

### 3.6.8.2 Induction Procedures on Child Protection

Every new member of the teaching and non-teaching staff, including new peripatetic musicians and sports coaches, is required to attend a training session on child protection and will be given a copy of part one of 'Keeping Children Safe in Education September 2019'. These sessions are organised by the Deputy Head, our DSL, and every effort will be made to hold them within your first week of arrival as a new member of staff at the school. Similar training is offered to all Governors and to the parents who help with activities that bring them into contact with children. The only adults who work or visit the school who are exempted from this requirement are:

- Night-time cleaners, whose hours of work mean that they do not have contact with pupils,
- Occasional visitors, including occasional lecturers and contractors, who are signed in by our School Marshal, who are escorted throughout their visit,

- Contractors working on a designated site that is physically separated from the rest of the school, who are required to sign in and out at their site office and to wear security badges at all times,
- Contractors working during the school holidays.

3.6.8.3 What is the reason for training?

### **Child protection is always our top priority**

Every member of staff needs to be confident that he or she understands his or her role in:

- Keeping children safe
- Promoting the welfare of pupils
- Promoting equal opportunities and inclusion
- Preventing bullying and harassment

Everyone is required to take part in the training, no matter what their previous background or level of expertise. Refresher training for all staff is held at three yearly intervals.

3.6.8.4 What topics does the training cover?

Our induction training will tell you about:

#### 1. Our pupil welfare systems

Starting with the roles of the following structures:

- *The Governors formally consider child protection issues once a year. The Governor for Child Protection issues is Mrs. Nicky Gayner.*
- The roles of the Senior Leadership Team and the DSL.
- The roles of form teachers.
- Our partnerships with parents and guardians

We will describe our arrangements for providing additional support for pupils with SEN and for whom English is an additional language.

#### 2. The Legal Framework for our Child Protection and Anti-Bullying Policies

We describe this briefly and cover our policies on:

- Anti-bullying
- Behaviour
- Learning Support
- Equal Opportunities
- Educational Visits
- The *Prevent* duty

Teaching staff have a particular responsibility for supervising pupils and ensuring that they behave with consideration and good manners at all times; but all staff need to be made aware of the school's policies in these areas. All staff are reminded of their important role in building positive relationships, identifying risks and keeping everyone safe. We cover internet and technological bullying, and the risks of the internet and social networking sites.

#### 3. Understanding Challenging Behaviour

We shall draw upon national guidance relating to the safeguarding and protection of children, the signs of abuse, and the duties of staff, as well as the role of specialist agencies. We shall explain our expectations of how they should respond in a difficult situation, why they cannot promise confidentiality to a pupil.

#### 4. The School's Policies on Child Protection

All new staff will be expected to become familiar with our policies on:

Child Protection

- Interaction with Pupils: The Staff Code of Conduct
- Pupils and Confidentiality Issues
- Practices and Procedures when a member of staff faces allegations of abuse
- The Whistle-blowing Policy

#### 5. Visitors and Site Security

This covers the need for visitors to be signed in at Reception and to be escorted about the school. The need to vet visiting speakers as part of the *Prevent* duty is also covered

#### 6. Effective Record Keeping

Why effective record keeping matters.

#### 7. Refresher Training

The session concludes with reminding staff that refresher training is given at three yearly intervals and by inviting all staff, Governors and volunteers to certify in writing that they have completed the training session.

Please sign and return to the Deputy Headmaster

**CHILD PROTECTION AND SAFEGUARDING INDUCTION PROCEDURES at Sussex House**

I \_\_\_\_\_ have attended an induction session on Child Protection Procedures.

As a result, I:

(A) Am familiar with the contents of the following documents:

- (i) Part one of *Keeping Children Safe in Education September 2019*
- (ii) Child Protection and Safeguarding Policy (Handbook Section 3.6)
- (iii) Whistleblowing Policy (Handbook Section 1.7)
- (iv) Professional Expectations (including the Code of Conduct) (Handbook Section 1.6)
- (v) Use of ICT, Mobile Phones and Other Electronic Devices (Handbook Section 2.5.1)
- (vi) Photography and using Images of Children (Handbook Section 2.5.2)

(B) Am aware of procedures for Child Protection at Sussex House.

(C) Know that Martin Back, the Deputy Head is the Designated Safeguarding Lead and that I can discuss any concerns that I may have with him.

(D) Know that further guidance, together with copies of the policies is in the Staff Handbook.

(E) Understand that Safeguarding is the responsibility of all staff.

Signed \_\_\_\_\_

Date \_\_\_\_\_