



# King Edward's

WITLEY

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## ***Child Protection and Safeguarding Policy: Recognising and Acting to Protect Children from Abuse***

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All adults working in King Edward's School have a responsibility for safeguarding and promoting the welfare of children in the child's best interests. They should know the name of the School's Designated Safeguarding Lead and the deputy for Child Protection and know and follow the relevant Child Protection Policy and procedures. All staff have a duty to report any child protection concerns to one of the Safeguarding Leads.

Anyone who has concerns or is in doubt should refer to one of the people named below. Referrals will be managed by them normally, but anyone can refer a child to children's social care, if necessary.

King Edward's School takes extremely seriously all its responsibilities in relation to child protection and safeguarding matters. The School takes its responsibility seriously to ensure that pupils are educated in ways to keep themselves safe. This is done in different ways and at different times through tutor groups, assembly, curriculum lessons in Relationships and Sex Education, PSHE and in ICT. Particular attention is given to the safe use of electronic devices and the internet.

### **GENERAL POINTS**

- **Mr David Corran, Deputy Head**, is trained at Level 3 and is the **Designated Safeguarding Lead** person for all aspects of safeguarding with the help of other colleagues.
- **Deputy Safeguarding Lead, Mrs Caroline Shouksmith, Head of Art, Mr Douglas Galbraith, Head of Chemistry and Mr Steve Gardner, Head of Lower School**, are experienced teachers and trained at Level 3 in child protection matters. Any can be contacted at times of concern.
- Mrs Bronwen Reinhardt is trained at Level 3 in child protection matters and as Bursaries and Charities Officer is available during the holiday periods.
- Mr Clive Marriott has been appointed by the governing body as the Governor with special responsibility for child protection matters. He can be contacted at [marriottc@kesw.org](mailto:marriottc@kesw.org) and he meets each term with the Deputy Head and reports annually to the Governing Body on child protection issues in order that it can undertake a review of the School's child protection policies and procedures and the efficiency with which the related duties have been

discharged. Mr Marriott is also nominated by the governing body to liaise with the Local Authority on, or in any case of, allegations against the Head or a member of the governing body.

- The School undertakes to remedy any deficiencies or weaknesses in child protection arrangements without delay.

All the above named people receive regular training every two years to enable them to be kept fully informed and up to date with the latest regulations and procedures.

- The School's approach to child protection issues is in accordance with the inter-agency procedures in Surrey between social care, the police and health services and this policy is available to parents on the website. It fully recognises its duties to both children in need and children at risk by co-ordinating help in a common assessment framework.
- The School will always take into account the context within which such incidents and/or behaviours occur so that wider environmental factors present in a child's life that could impact on their safety and welfare are given due consideration.
- In addition to this Policy and advice, reference can be made to *Keeping Children Safe in Education* (DfE September 2019) and *Working Together to Safeguard Children* (WTSC July 2018) which give detailed help and advice. The Prevent Duty Guidance for England and Wales (March 2015) also contains important advice. Staff should be aware of the situations in which their actions have the potential to be misinterpreted and which might then give rise to child protection concerns. The documents referred to do provide the detail but, briefly, staff should exercise particular care in settings of the following nature:
  - social events
  - the giving of gifts
  - pupils in distress
  - PE, games and other physical activities
  - showers and changing
  - one-to-one situations
  - educational visits
  - home visits
  - transporting pupils
  - use of photography and other electronic media, including ICT
  - boarding environment
- Staff are therefore required to:
  - read and show that they understand Part 1 and Appendix A of *Keeping Children Safe in Education* and this Child Protection and Safeguarding Policy (including appendices) and discharge their role and responsibilities as defined therein
  - understand the responsibilities which are part of their employment or role, and be aware that sanctions will be applied if these provisions are breached
  - always act, and be seen to act, in the child's best interests
  - avoid any conduct which would lead any reasonable person to question their motivation and intentions
  - take responsibility for their own actions and behaviour

They should also NOT:

- use their position to gain access to information for their own advantage and/or a child's or family's detriment
  - use their power to intimidate, threaten, coerce or undermine pupils
  - use their status and standing to form or promote relationships with children, which are of a sexual nature or which might become so
- Where no specific guidance exists about particular situations or where staff are worried about how their actions might be interpreted staff are advised that they should:
    - discuss the circumstances that informed their action, or their proposed action, with a senior colleague or one of the Safeguarding Leads. This will help to ensure that the safest practices are employed and reduce the risk of actions being misinterpreted.
    - always discuss any misunderstanding, accidents or threats with a senior colleague or the Safeguarding Leads
    - always record discussions and actions taken with their justifications

Further details on staff behaviour protocols can be found in Appendix 2 of this document.

- All staff (including the Head and those who are temporary or volunteers) are required to receive child protection training and advice as part of the induction process and thereafter on an annual basis and occasional staff and volunteers (who will have been vetted in accordance with the School's recruitment procedures) are made aware of child protection arrangements. Updated information is passed on regularly, and at least annually. Feedback from such training and awareness, together with regular training of the Safeguarding Leads, allow for amendments to the Policy where weaknesses and deficiencies are identified. All staff are required to read both the Child Protection and Safeguarding Policy (including appendices) and at least Part 1 and Appendix A of *Keeping Children Safe in Education* and to sign to show that they have done so and complete a written task to show that they have understood it. Updates are issued when necessary. Induction training for all staff makes reference to the Child Protection and Safeguarding Policy which contains staff behaviour protocols, whistleblowing procedures and the identity and role of the Safeguarding Leads. The training for the Safeguarding Leads includes both child protection and inter-agency working and takes place at least every two years on recommended courses to cover inter agency working, case conferences, support for children in need, record keeping, promotion of a culture of listening to children, on-line safety and the Prevent duties.
- The School operates safe recruitment procedures in accordance with the requirements of the Disclosure and Barring Service as laid down in *Keeping Children Safe in Education* (DfE September 2019); these procedures are also in accordance with the Independent School Standards Regulations. CWDC and more recently NSPCC and Channel on-line training has been completed by key members of staff. The School also seeks to ensure that employees of another employer who are working on the School site and who have contact with, or responsibility for, King Edward's pupils have had all the necessary recruitment checks made by their employer or other agency; in cases of doubt the School would not use the services of such people. Full details of the recruitment procedures can be found in Appendix 1 at the end of this document.

- The School has clear procedures in place to deal promptly with allegations of abuse against members of staff, volunteers or the Head. In summary, such allegations would normally be directed to the Head or Designated Safeguarding Lead in the case of any member of staff or volunteer, and to the Treasurer (Chairman of Governors) in the case of the absence of the Head or an allegation against the Head. The Head will not be informed of this referral if the allegation is against the Head. If the allegation is against one of the Safeguarding Leads, it should be made to the Head without informing the Safeguarding Leads. Following the guidance of Part 4 of *Keeping Children Safe in Education* (DfE September 2019), the Head is required to consult with The Local Authority Designated Officer on any matters relating to allegations against a member of staff within 24 hours and before any investigation is undertaken. In the most serious cases the police are also informed. All discussions will be recorded in writing, and due weight will be given to the view of The Local Authority Designated Officer when a decision is being made about the suspension of a member of staff. If a member of boarding staff is suspended pending investigation of a child protection nature, arrangements for accommodation will be made away from children.
- The School will exercise its responsibility to report within one month of leaving the School any person (employed, contracted, a volunteer or a pupil) whose services are no longer required because that person is considered to be unsuitable to work with children. A report will also be made to the DBS if the School believes that the person has harmed or poses a risk of harm to a child or vulnerable adult, satisfies the harm test or has received a caution or conviction for a relevant offence. The report will be made even if the person to be dismissed or removed has resigned first. The School will exercise its duty to consider making a referral to The Teaching Regulation Agency where a teacher has been dismissed or would have been dismissed if he or she had not resigned and a prohibition order may be appropriate. Examples would include unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence, in accordance with *Teacher misconduct; the prohibition of teachers* (DfE 2014). Failure to make a report constitutes an offence.

The School takes extremely seriously its responsibilities for the care and safety of pupils. This is undertaken in the School environment by having clear procedures for safer recruitment and for dealing with any form of child abuse. It reinforces this sense of responsibility by ensuring that the staff of another organisation have been checked for suitability if they supervise the School's pupils on a site other than the School.

**"Someone may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm."**

Because we are in regular and frequent contact with pupils, school staff are particularly well placed to observe outward signs of abuse or unexplained changes in behaviour or performance which may indicate abuse, either at home or at school. It is also important to recognise that we are also in a privileged position with regard to pupils and we must be careful not to give grounds for any potential allegation of inappropriate conduct.

It is also necessary to bear in mind that a change in behaviour may have a number of causes, not least hormones or others such as drug or alcohol use.

## What is Child Abuse?

**Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused by those known to them or by strangers via the internet. The abuse may be inflicted by an adult or another child. In many cases, issues overlap with one another.**

Useful information can be found in *What to do if you are worried a child is being abused* (DfE March 2015).

Abuse can be defined under four categories [taken from *Working together to Safeguard Children* (DfE July 2018) and *Child Sexual Exploitation, definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation* (DfE February 2017)]:

**Physical abuse:** when adults deliberately inflict injuries on a child or, knowingly, do not prevent them. It includes hitting, shaking, throwing, poisoning, burning or scalding and otherwise causing physical harm to a child. It also includes excessive force. Giving a child poisonous substances, inappropriate drugs or alcohol, and attempting to suffocate or drown a child are also examples of physical abuse. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a child whom they are looking after. This situation is commonly described using terms such as factitious illness by proxy or Munchausen's Syndrome by proxy. "Honour based" violence (HBV) of all types is abuse and includes crimes which have been committed to protect or defend the honour of the family and/or the community, including forced marriage and practices such as breast ironing.

Typical symptoms to look out for: -

- bruises and abrasions – especially about the face, head, genitals or other parts of the body where they would not be expected to be given the age of the child. Be particularly concerned when the nature of the injury does not match the child's explanation
- slap marks
- twin bruises on either side of the mouth indicative of force feeding or stopping a child from speaking
- grip marks on the arms or trunk are usually an indication of shaking but can also be indicative of sexual abuse
- bruised eyes are usually caused by a fist
- damage to the mouth
- bite marks
- fractures
- poisoning and misuse of drugs
- burns and scalds can indicate misuse of aerosols or cigarettes

**Emotional abuse:** the persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on a child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or making fun of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as over-protection and limitation of exploration and learning or preventing the child participating in normal social interaction.

It may involve seeing or hearing the ill treatment of someone else. It may involve serious bullying, including cyber-bullying, causing children to feel frightened or in danger, the exploitation or corruption of children or the exchange of banter. Any form of initiation ritual would be regarded as peer-on-peer abuse. Some level of emotional abuse is present in all types of ill treatment of a child although it may occur alone.

Things to look out for:-

- children who feel that they are unloved and unlovable
- inability to form good relationships
- overburdened by ambitious, unrealistic parents

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is fully aware of what is happening. The activities may involve inappropriate physical contact, including penetrative (e.g. rape or buggery) or non-penetrative acts (e.g. kissing, rubbing, masturbation and touching the outside of clothing). This may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways. Sexual abuse can take place online and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Grooming a child in preparation for abuse including via the internet is also a matter of sexual abuse.

Typical symptoms to look out for:-

- a detailed sexual knowledge inappropriate to the age of the child
- behaviour that is excessively affectionate or sexual towards other children or adults
- victims will often make a limited disclosure to an adult but will often be preoccupied with secrecy and will try to convince the adult to keep dangerous information secret
- fear of medical examinations
- a fear of being alone with particular adults
- a sudden loss of appetite, compulsive eating, anorexia nervosa or bulimia nervosa
- excessive masturbation, especially worrying if it takes place in public
- promiscuity
- sexual approaches or assaults on adults or other children
- pregnancy, urinary tract infections or sexually transmitted diseases are all immediate causes of concern
- bruises to the breast, buttocks, lower abdomen, thighs, genital and rectal areas
- discomfort or pain in the anal area
- the drawing of sexually explicit or pornographic images
- the need to change underwear excessively

It should be remembered that all of the above are typical, but may have other causes.

**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. It may start with substance abuse by mother during pregnancy, involve a parent or carer failing to provide adequate food, shelter and clothing, including exclusion from home or abandonment, failing to protect a child from physical and emotional harm or danger, or the failure to ensure adequate supervision or access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Typical signs to look out for:-

- persistent stomach aches
- if a child is seriously underweight and is stealing food
- inadequately clad in that they are dirty or smell

If a child is suffering from any of the above, they are likely to also exhibit signs of stress and distress. Typical signs to look for:-

- a lack of concentration and falling off of school performance
- aggressive or hostile behaviour
- moodiness, depression, irritability, listlessness, fearfulness, tiredness, temper tantrums, short concentration span, acting withdrawn or crying at minor occurrences
- difficult relationships with peers
- regression to more immature forms of behaviour e.g. thumb sucking
- self harming or suicidal behaviour
- low self-esteem
- running away and being inexplicably absent from School and so missing education; there are clear protocols for dealing with this in the Missing or Absconding Pupils Policy

**Child Sexual Exploitation:** Child sexual exploitation, including violence and harassment, 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 in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

No school is immune to the risk of child sexual exploitation including online and it can affect both boys and girls. Children can be perpetrators as well as victims.

Signs of Child Sexual Exploitation may include:-

- unexplained gifts and new possessions
- association with young people involved in exploitation
- having much older boyfriends or girlfriends
- suffering from sexually transmitted infections
- suffering changes in emotional well-being
- drug and alcohol misuse
- being absent for periods of time and regularly reaching home late
- missing education

The same indicators may suggest that children have been approached by or are involved with individuals associated with criminal networks or gangs. These children are at risk of involvement in serious violent crime. Further advice can be found in the DfE publications Preventing youth violence and gang involvement and Criminal exploitation of children and vulnerable adults, county lines.

The School will provide sensitive education on all aspects of abuse appropriate to the age on these issues in PSHE lessons, in ICT lessons and through tutor periods, Assemblies and Chapel services. The staff in the Medical Centre are also available to help raise awareness and provide guidance on issues surrounding sexual exploitation. These themes are also shared with parents so that they can support the School.

**Female Genital Mutilation:** Staff must be aware of the requirement for teachers to report to the police where they discover, either through disclosure by the victim or through visual evidence, that female genital mutilation appears to have been carried out on a girl under the age of 18. It will be rare to see evidence of it, as staff should not be routinely examining pupils. Unless there is good reason not to, the case should be discussed with the Designated Safeguarding Lead so that involvement of external agencies can be sought. Failing to report such cases is a criminal offence. Further useful information can be found in *Mandatory Reporting of Female Genital Mutilation – procedural information*, published by The Home Office in October 2015, updated December 2016.

**Sexting:** Sexting is the generation of images by or of children under the age of 18 of a sexual, indecent nature. Young people who share such images may be committing a criminal offence, as it is a crime to:-

- take an indecent photograph or to allow an indecent photograph to be taken
- make an indecent photograph, including downloading or opening an image that has been sent by e-mail
- distribute or show such an e-mail
- possess with the intention of distributing images
- possess such images

Any disclosure relating to sexting should be treated as any other safeguarding disclosure. Staff may confiscate an electronic device if they have good reason so to do, but must not view, copy or print any such imagery. Material should not be removed from one device to another, printed or saved. The necessary referrals to the police or social care will be made. Support for the victim, including counselling will be offered. Parents and carers will be informed about the incident and the way in which it is being managed.

**Peer on peer abuse:** child abuse can and does happen anywhere, in poor and affluent homes, in rural, suburban or city areas, involving one or both parents, guardians or teachers. Abuse may also be inflicted on another pupil by one or more pupils and must never be tolerated, even if it could be considered to be banter or simply a childish joke. It is more likely that girls will be victims and boys perpetrators, but all peer-on-peer abuse is unacceptable.

Children who are victims of sexual violence and sexual harassment are likely to find the situation stressful in a way that will adversely impact on their education attainment as well as their emotional well-being. Sexual violence and sexual harassment exist on a continuum and may overlap; they occur online and offline, both physically and verbally. Upskirting typically involves taking a picture under a person's clothing without them knowing to view their genitals or buttocks for sexual gratification or for humiliation, distress or alarm for the victim. Victims must be taken seriously and offered full support to avoid disruption to their education. Other children and staff should also be supported and protected as appropriate. The School's response will be risk assessed on a case-by-case basis by the Designated Safeguarding Lead or one of the Deputies. The options include managing the matter internally, seeking Early Help intervention, referring to the MASH and reporting to the police.

The School provides a clear set of values and standards, as outlined in the behaviour policy, pastoral support and a planned programme of evidence-based content delivered through the curriculum. The matter could constitute a serious breach of the behaviour policy and lead to permanent exclusion. Staff are appropriately trained to deal with peer-on-peer abuse.

Further details can be found in *Sexual Violence and Sexual Harassment between Children in Schools and Colleges*, (DfE May 2018)

**Domestic abuse:** domestic abuse involves the use of power and control by one person over another and includes elements of all other forms of abuse. Children who witness domestic abuse are at risk of significant harm to their wellbeing and understanding of healthy, positive relationships. The School is enrolled onto the Surrey Operation Encompass scheme and is alerted every day to all domestic abuse incidents that have been reported to Surrey Police so that the right support can be put in place at the right time for children who are experiencing domestic abuse.

### **What to do if you become aware of abuse**

Care must be taken when recognising abuse and neglect in pupils with special educational needs or disabilities as they can be disproportionately impacted by things such as bullying. Additional barriers could be the assumption that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.

In a boarding environment especially, there is likely to be an enhanced risk that inappropriate relationships could develop. The School will be alert to any potential abuse by peers and may consider some aspects of bullying as a child protection matter. There may be reasonable cause to suspect that a child is suffering or is likely to suffer significant harm. In such cases it is probable that House Staff will be in the best position to assess the situation; House Prefects and Mediators will also be well-placed.

If you (or a pupil) have any worries or concerns share them immediately with one of the Safeguarding Leads. Early help in identifying emerging problems and sharing information is crucial. If you do not, you could be allowing the child to be put at further risk, and vital information may not come to light. Staff **MUST NOT** keep secrets or make promises to the pupil that other appropriate adults (e.g. social care or police) will not be involved. Even if a pupil later retracts their statement, the referral could still be made. Particular attention to the potential need for early help should be given to a child who:

- is disabled and/or has specific additional needs
- is a young carer
- shows signs of being drawn into anti-social or criminal behaviour
- is frequently missing
- is misusing drugs and/or alcohol
- is at risk of exploitation

Ensure that the pupil is in a safe place, for example the Medical Centre or the boarding house. If a day pupil is involved encourage him/her to stay in School until all the information has been collected.

At all times when information is being gathered the Safeguarding Leads will be present, to support the pupil and explain what is taking place.

One of the Safeguarding Leads will liaise with the Head and telephone the appropriate services for advice; such contact will be made within 24 hours especially in the case of those who have suffered or who are likely to suffer significant harm. Children in need will be referred to the child's social care by one of the Safeguarding Leads, but this will be done immediately in the case of children at risk so that inter-agency assessments can take place. The police will be contacted if a crime has been committed. Contact may also need to be made if the case involves one of abuse perpetrated by one or more pupils against another.

If it is thought that there is a case to pursue, the police or other agency will come to the School and interview the pupil in the Medical Centre. It is most important that the House Staff member is present, acting as guardian.

Staff **MUST** remember:-

- that the priority is to protect the child
- to take the matter seriously in a supportive way
- when initially talking to the child not to ask leading questions or "put words in their mouth"
- to gather information on a "need to know" basis; you do not need the whole story, just sufficient to take the next step
- that the child is very vulnerable and to reassure the child that you have taken what they had to say seriously
- keep a record of the facts of the matter to pass on to the Designated Safeguarding Lead

Staff **MUST NOT**:-

- contact the parents any further
- interrogate the child or ask leading questions
- speak to anyone about whom the allegations are made
- promise to keep secrets or maintain confidentiality
- ask the child outright if they have suffered abuse

**One of the most important things to do is to LISTEN to what a young person is telling you. He or she may want to tell you about abuse and your reaction to this is vital. Remain non-judgmental.**

### **Whistle-blowing**

The School recognises that workers who disclose certain types of information to certain individuals in certain circumstances are protected by the *Public Interest Disclosure Act 1998*. This enables a worker to raise reasonable concerns internally and in a confidential fashion about safeguarding, fraud, malpractice, health and safety, criminal offences, miscarriages of justice, failure to comply with legal obligations or environmental damage. The policy also provides, if necessary, for such concerns to be raised outside the School. The School will not tolerate malpractice and seeks to provide a clear, simple and confidential procedure for raising concerns, which is accessible to all members of staff. A qualifying disclosure is likely to show, in the reasonable belief of the worker, one or more of the following:

- that a criminal offence has been committed, is being committed or is likely to be committed
- that a person has failed, is failing, or is likely to fail to comply with a particular legal obligation
- that a miscarriage of justice has occurred, is occurring or is likely to occur
- that the health and safety of any individual has been, is being or is likely to be endangered
- that the environment has been, is being or is likely to be damaged

- that information indicating the occurrence of any of the above has been, is being or is likely to be concealed
- that safeguarding issues are not being taken seriously

To be protected, a disclosure must be made 'in the public interest' and must be:

- to the employer, or the person legally authorised by the employer to receive disclosures. (In this School, the Governors are the employer and the Head and the Director of Finance and Administration are authorised to receive disclosures). In the case of a child protection or a safeguarding issue, the disclosure can be made to any member of the team of staff named in the policy or
- to a 'Prescribed Person' or
- to an individual unconnected with the organisation ('External Disclosure') or
- undertaken in exceptionally serious cases.

'Prescribed Persons' are those bodies prescribed by an order made by the Secretary of State. The Public Interest Disclosure (Prescribed Persons) Order 1999 lists more than 30 regulatory bodies to whom protected disclosures may be made. These include the Data Protection Registrar, the Environment Agency and the Health and Safety Executive. Disclosure may also be to a legal adviser.

Workers who make 'External Disclosures' are expected to have previously raised the matter with the employer or a 'Prescribed Person', or have not done so because they reasonably believe that they will be subjected to a detriment or that a complaint to the employer would result in evidence being concealed or destroyed. The worker must also make the disclosure in the reasonable belief that the allegations are substantially true and must not act for personal gain. It must also be 'reasonable in all the circumstances' of the case to make the disclosure.

Employees who wish to raise a concern under this procedure are entitled to have the matter treated confidentially and their name will not be disclosed to the alleged perpetrator of malpractice without their prior approval. It may be appropriate (to preserve confidentiality) that concerns are raised orally rather than in writing, although members of staff are encouraged to express their concern in writing wherever possible. If there is evidence of criminal activity then the police will be informed.

Additionally a member of staff is at liberty to express any concern to the Head or the Director of Finance and Administration. Any concern raised will be investigated thoroughly and in a timely manner, and appropriate corrective action will be pursued. The member of staff making the allegation will be kept informed of progress and, when possible (subject to third party rights) will be informed of the resolution. A member of staff who is not satisfied that their concern is being properly dealt with by the Head or Director of Finance and Administration will have a right to raise it in confidence with the governing body.

No member of the staff will suffer a detriment or be disciplined for raising a genuine and legitimate concern, providing that they do so in good faith and following the whistle-blowing procedures.

The NSPCC whistleblowing helpline is available for staff. Calls can be made to 0800 028 0285, and the email address is [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

#### CONTACT TELEPHONE NUMBERS

	<b>Internal:</b>	<b>External:</b>
<b>Designated Safeguarding Lead person:</b> <b>Mr David Corran</b>	748	01428 686748 07460 173023
<b>Deputy Safeguarding Lead:</b> <b>Mrs Caroline Shouksmith</b>	775 (Art)	01428 686775 07427 502552
<b>Deputy Safeguarding Lead:</b> <b>Mr Douglas Galbraith</b>	356 (Chemistry)	01428 686356 01428 685630 07989 507173
<b>Deputy Safeguarding Lead:</b> <b>Mr Steve Gardner</b>	371 (QMH)	01428 686731 07876 885904
<b>Head:</b> <b>Mrs Joanna Wright</b>	710 and 743	01428 686743

#### Surrey Safeguarding Children Board (SSCB)

The Surrey Safeguarding Children Board co-ordinates how children are safeguarded and protected from harm. The SSCB is based in Leatherhead. Their website provides guidance and protocols for professionals as well as details of child protection courses available.

- Normal: 0300 470 9100
- Out of hours: 01483 517898
- Email: [csmash@surreycc.gov.uk](mailto:csmash@surreycc.gov.uk)

#### Local Area contact for Waverley

- Duty Desk : 0300 123 1640

#### LADO

- Duty Desk: 0300 123 1650
- Email: [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk)

#### Useful contacts

- SSCB Support Team 01372 833330 [sscb@surreycc.gov.uk](mailto:sscb@surreycc.gov.uk)
- SSCB Chair 01372 833378 [sscbchair@surreycc.gov.uk](mailto:sscbchair@surreycc.gov.uk)
- SSCB Training 01372 833330 [sscb.training@surreycc.gov.uk](mailto:sscb.training@surreycc.gov.uk)

Surrey is deemed a low risk county for terrorist activity, but there remains the possibility of some suspicious behaviour in this regard. Concerns can be reported in a number of ways:

- Surrey Police non-emergency number 101
- DfE dedicated helpline for non-emergency advice 0207 340 7264
- DfE email [counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk)
- Anti-terrorism hotline 0800 789 321
- If it is an emergency dial 999

All children must receive the right help at the right time to prevent issues from escalating. Although the expectation is that referrals will be made by any one of the Safeguarding Leads, anyone can make a referral if necessary.

This policy is reviewed annually by the Senior Management Team, the Deputy Head and the Governor responsible for Child Protection and Safeguarding and also the full governing body at the Summer Term meeting to ensure its efficiency. At that meeting, the Treasurer will sign a declaration that the policy has been reviewed.

## Appendix 1

### Recruitment Procedures

#### 1. Introduction

King Edward's Witley is committed to providing the best education and care to its pupils and to safeguarding and promoting the welfare of the young people in its care. The School is also committed to providing a supportive and flexible working environment for its entire staff. The School recognises that, in order to achieve these aims, it is of fundamental importance to attract, recruit and retain staff of the highest calibre who share this commitment. Employees involved in the recruitment and selection of staff are responsible for familiarising themselves and complying with the provisions of the Policy.

#### 2. Aims

The policy aims to fulfil the following conditions:

- To ensure that the best possible employees are recruited on the basis of their merits, abilities and suitability for the position.
- To ensure that all job candidates are considered equitably and consistently.
- To ensure that no job candidate is treated unfairly on any grounds including race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital status, disability or age.
- To ensure compliance with all relevant recommendations and guidance including the recommendations of the DfE in *Keeping Children Safe in Education (DfE September 2019)* and the code of practice published by the Disclosure & Barring Service (DBS).
- To ensure that the School meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks.

#### 3. Procedures for recruitment and selection

1. The Head and Director of Finance and Administration authorise the recruitment of academic and support staff respectively. This applies to both existing and new posts. The grade/salary range will normally be agreed at this point, together with the employee responsible for the recruitment and the timescales.
2. The Head of Department is responsible for drafting/updating Job Descriptions which then must be approved by the Head or Director of Finance and Administration or the Deputy Head and the HR Department, as appropriate. The HR Department will approve the wording for advertisements (internal and external) taking instructions from the Head, Director of Finance and Administration or the Deputy Head, as appropriate.
3. The HR Department is responsible for issuing details of internal only jobs to all employees at both schools (with instructions for copies to be placed on noticeboards at both schools by Managers). In all other circumstances, the employee responsible for the recruitment is to agree the recruitment strategy with the HR Department who will then organise the process, notify employees and arrange for the websites at both schools to be updated.

4. All candidates are to receive an application form and notes about its completion, a job description, person specification and policies on equal opportunities, the recruitment of ex-offenders and child protection. Applications should be made by a completed application form and accompanying CV and cover letter.
5. The employee responsible for the recruitment will agree with the HR Department if applications are to be considered all together after the closing date (the usual and preferred procedure) or if applications are to be considered as they arrive (due to it being in the best interests of the School). All employees who consider the applications are required to keep a written record of the selection criteria applied. Any anomalies, discrepancies or gaps in employment history are to be noted and are to be investigated thoroughly at interview. A shortlist of candidates for interview will then be drawn-up and agreed with the Head/Director of Finance and Administration/Manager, as appropriate.
6. The HR Department together with relevant staff will invite candidates to interview, request references, organise a programme of interview(s), and a safeguarding interview together with a tour, as appropriate. Unsuccessful applicants will be notified, in batches, at the relevant stages of the recruitment process by the HR Department.
7. A set of questions and issues to be explored with each candidate is to be decided prior to interview. Follow-up questions may be asked at interview and these are likely to be different for each candidate.
8. Original copies of all qualifications (photocopies are not sufficient) are to be verified by the HR Department when short-listed candidates visit for interview and photocopies are to be taken. Identity and right to work is to be checked, normally against a passport or driving licence. Proof of address is to be checked against two utility bills or similar documentation. National Insurance numbers are to be confirmed. A link to complete a DBS Enhanced Disclosure will be sent to the successful candidate by email for completion on line.
9. Candidates for all posts are to be interviewed formally usually by no less than two people, one of whom will have completed the NSPCC online recruitment training. Interview and visit procedures will vary according to the post but may include a tour of the School, introduction to relevant employees and, in the case of teachers, might include teaching a lesson or taking an activity.  
  
All employees conducting interviews are to keep a written record of the interview and the selection criteria used. A post interview meeting will usually be held to discuss the candidates. A written note of the safeguarding interview is to be kept and dated/signed by the employees conducting the interview.
10. At least two written references are to be obtained direct from the referees, one of which should be from the current or most recent employer. References are to be requested in the appropriate form, which is to include specific questions regarding the suitability of the candidate for a post which involves extensive contact with children. A job description and person specification is to be sent to all referees. References are

to be requested for internal and external candidates. Whenever possible, references should be obtained prior to interview.

11. A job offer (prepared by the HR Department) cannot be made until the safeguarding interview has been undertaken. The relevant conditions/terms of the offer are to be approved by the Head/Director of Finance and Administration, as appropriate.
12. Candidates will be contacted after interview, normally within 36 hours and a verbal provisional offer of employment will be made to the successful candidate. This candidate will be invited to respond verbally within 24 hours. If the provisional offer is accepted, a formal offer of employment is made in writing, but is subject to the following conditions being met:
  - Verification of identity and qualifications.
  - The receipt of at least two satisfactory written references.
  - A satisfactory Enhanced Disclosure from the DBS and a check of the DfE's Children's Barred List and the Protection of Children Act List, as appropriate.
  - The completion of a satisfactory medical questionnaire to provide verification of medical fitness in accordance with DfE's Circular 4/99 Physical and Mental Fitness to Teach of Teachers and Entrants to Initial Teacher Training.
  - For teaching posts, verification of professional status such as QTS status (where required), NPQH, etc., and (for those who obtained QTS after 7 May 1999) of successful completion of the statutory induction period. For registered nurses, verification of professional qualifications and registration with the Nursing & Midwifery Council (NMC). Nurses must be registered with the NMC to legally call themselves a registered nurse and work as a nurse.
  - Where the successful candidate has worked or been resident overseas in the previous five years, such checks and confirmations as the School may require in accordance with statutory guidance.
  - DfE website for any prohibition – for teachers only.
  - Satisfactory completion of the probationary period.
13. Once the candidate has accepted the position, the HR Department is responsible for all pre-joining matters, including:
  - DfE prohibition order for teachers and a section 128 check for managerial roles
  - EEA pre-employment checks for academic staff
  - Enhanced Disclosure & Barring Service (DBS) including the Children's Barred List check
  - Qualification documents (as appropriate)
  - Notifying the ICT Department (for iSAMS and equipment)
  - Triggering a staff accommodation letter (where relevant)
  - Obtaining the required references
  - Obtaining medical clearance
  - Notifying payroll
  - Notifying existing staff
  - Induction process
  - Child Protection Training
  - Fire Safety Training

If at any stage, any matters arise (including disclosures, reference concerns), these are to be immediately brought to the attention of the Head of HR.

14. All interview records are securely filed for 12 months after which those for unsuccessful candidates are to be destroyed.
15. A new Disclosure application will be completed for all new employees and for contractors who are regularly on site during term-time. Sight of the original copy of a recently issued Enhanced Disclosure may suffice for those joining for short periods of supervised teacher training and the like.
16. The School's normal procedures are that an employee can only start once the DBS has been obtained and seen by the HR Department. Only the Deputy Head (the Senior Employee with Safeguarding oversight) can authorise a start where a Children's Banned List check has been obtained and it is considered that, together with an appropriate Risk Assessment/agreed controls, it is appropriate for employment to commence.
17. When the DBS has been confirmed, the HR Department is responsible for inspecting the certificate which will have been issued directly to the individual.
18. The HR Department will issue the Contract of Employment within two months of the employment commencing.

#### **4. Application and recruitment process explanatory notes**

1. Applications will only be accepted from candidates completing the application form in full. CVs will not be accepted in substitution for completed application forms in the absence of good reason, although should be included to support the application.
2. Candidates should be aware that all posts in the School involve some degree of responsibility for safeguarding children, although the extent of that responsibility will vary according to the nature of the post. The job description will provide detailed information.
3. The successful candidate will be required to complete an application for an Enhanced Disclosure from the Disclosure & Barring Service (DBS).
4. For teaching and some other posts, references will be sought for short-listed candidates and the School may approach previous employers for information to verify particular experience or qualifications before interview. The School would seek to be sensitive about approaching previous or current employers before interview.
5. For those currently working with children, on either a paid or voluntary basis, the current employer will be asked about disciplinary offences, including disciplinary offences relating to children or young persons (whether the disciplinary sanction is current or time-expired). They will be asked whether the candidate has been the subject of any child protection allegations or concerns and if so the outcome of any enquiry or disciplinary procedure. Those not currently working with children but who have done so in the past will have the past employer asked about those issues. Where

neither employment has involved working with children, the current employer will still be asked about the candidate's suitability to work with children.

6. The provision of false information is an offence and could result in the application being rejected or summary dismissal if the candidate has been selected, and possible referral to the relevant authority, as shown in the Child Protection Policy (the police and/or DfE's Children's Safeguarding Operation Unit).

## **5. The Interview**

1. Interviews for short-listed candidates will be conducted in person and the areas which it will explore will include suitability to work with children.
2. The interview will normally be conducted by a panel which will normally include a senior employee who has been trained under the NSPCC on-line training programme.
3. The interview will also explore the candidate's suitability for the post in question.
4. Questions asked of each candidate will follow a common pattern but follow-up questions may require to be tailored to the response given to the initial question.
5. All candidates invited to interview must bring the documents specified confirming any educational and professional qualifications that are necessary or relevant for the post (e.g. the original or certified copy of certificates and diplomas). Where originals or certified copies are not available for the successful candidate, written confirmation of the relevant qualifications must be obtained from the awarding body.

## **6. Recruitment of ex-offenders**

1. The School will not unfairly discriminate against any candidate for employment on the basis of conviction or other details revealed. If the candidate has a criminal record this will not automatically debar him or her from employment within the School; each case will be decided on its merits. It should, however, be recognised that posts in the School are exempt from the Rehabilitation of Offenders Act 1974 and therefore all convictions, cautions and bind-overs, including those regarded as 'spent', must be declared.
2. Candidates should be aware that a failure to disclose information or the provision of false information is an offence and could result in the application being rejected or summary dismissal if the candidate has been selected and possible referral to the relevant authority (the police and/or DfE's Children's Safeguarding Operation Unit).
3. It is a criminal offence for any person who is disqualified from working with children to attempt to apply for a position within the School.
4. In the event that relevant information is volunteered by a candidate during the recruitment process or obtained through a Disclosure check, the School will carry out a risk assessment related to this information.
5. If a candidate wishes to dispute the information obtained through a Disclosure, he or she can do so by contacting the DBS direct. In cases where the candidate would otherwise be offered a position were it not for the disputed information, the School

will, where practicable, defer a final decision about the appointment until the candidate has had a reasonable opportunity to challenge the Disclosure information.

## **7. Retention of records**

1. The School's policy is to follow the guidance issued or supported by the DBS on the use of Disclosure information. In particular, the School will store Disclosure information and other confidential documents issued by the DBS in locked, non-portable containers, access to which will be restricted to members of the senior management. Information will not be retained longer than necessary. The School will retain information of the date of Disclosure, the name of the subject, the type of Disclosure, the position in question, the unique identifier number and the decision taken. Destruction of material will be by secure means and Disclosure information will not be copied or scanned to any third party. The School complies with the provisions of the DBS Code of Practice, a copy of which is available on request.
2. If a candidate is appointed, the School will retain any relevant documentation provided on the application form (together with any attachments) on their personnel file. If the application is unsuccessful all documentation relating to this will normally be retained for twelve months and then destroyed.

## **8. Queries**

Any questions about employment at King Edward's Witley should be directed to the HR Department.

## Appendix 2

### Staff behaviour protocols

#### 1. Underlying principles

- The welfare of the child is paramount; all staff have a duty to keep children safe and to protect them from harm
- Staff are responsible for their own actions and should avoid any conduct which would lead a reasonable person to question their motivation and intentions; their behaviour must reflect integrity, maturity and good judgement
- Staff should take advice from their line manager or a senior member of staff over any behaviour or incident that gives a cause for concern
- Professional standards and judgements should be applied consistently towards all pupils.
- Behaviour which might be misinterpreted by others must be avoided
- Staff are aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action against them

#### 2. Position of trust

As a result of the knowledge, position and authority invested in their role, all adults working with children are in positions of trust in relation to a child in their care or who has recently left the School. A relationship between a member of staff and a pupil is not a relationship between equals. There is the possibility of exploitation and harm of vulnerable young people, and staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. When a person aged 18 or over is in a position of trust with a child under 18 or a member of the School over 18, it is an offence for that person to engage in sexual activity with or in the presence of that child or to cause or incite that child to engage in or watch sexual activity.

#### 3. Propriety and behaviour

- Staff should never make sexual remarks to a pupil, including in an e-mail, text message or any other electronic form of communication
- Staff should never discuss their own personal relationships with or in the presence of pupils
- Staff should never humiliate or demean pupils
- Staff should not seek to establish social contact with pupils in any way and in particular via electronic communication and social media; conferring special attention upon a child might be construed as being part of a grooming process
- Staff should not give their personal details such as phone numbers or e-mail addresses unless a specific need to do so has been agreed with The Head or Deputy Head

#### **4. Physical contact**

There are occasions when it is appropriate for staff to have physical contact with pupils, but this must be in a way appropriate to their professional role. When physical contact is made with pupils, this should be in direct response to their needs at the time, limited in duration and appropriate given their age, gender, ethnicity and background. Physical contact should never be secretive or for the gratification of the adult or represent a misuse of authority.

If it is necessary to restrain or control a pupil, the amount of force used must be proportionate to allow the individual to regain control of themselves.

#### **5. Working in one-to-one situations with a pupil**

Staff should recognise the added vulnerability of the one-to-one situation and plan accordingly. The safety of both the child and the adult is vital in such circumstances. The following principles should help:-

- Such meetings should take place in an open area and not in remote, secluded parts of the campus
- The venue should allow others to see into the room
- The door should be left open, if appropriate
- Another adult should be informed about the meeting beforehand and about the likely venue for it
- If the situation becomes difficult, the matter should be reported to a line manager

Prearranged meetings with pupils away from the School campus are not acceptable unless approval has been obtained from the pupil's parent and a senior member of staff. This applies to staff accommodation in the boarding houses and around the campus.

These behaviour protocols apply at all times and are not restricted to times when the School is formally in session. In particular they apply on all School trips and especially those of a residential nature.

In addition to the information that is contained within this policy, the School has other policies to which reference can be made to show the standards of professional behaviour that are expected of its staff. Those policies marked \* are available on the website, but other policies and documents can be obtained from The School Office upon request.

Alcohol

Anti-Bullying and Cyberbullying\*

Code of Conduct for Residential Educational Visits in the UK and Abroad\*

Code of Safety in Outdoor Activities\*

Confidentiality Procedure

Equal Opportunities

Health and Safety Policy\*

Hire, Sale, Borrowing or use of School Property

ICT Acceptable Use Policy

Internal and External Communications

Missing or Absconding Pupils - Procedure to be followed

Nursing and Midwifery Code of Conduct for Nurses

Photography

Social Media – staff use policy

Staff Employment Handbook - especially sections v and vi and the appendices of the Staff Handbook

Standards expected from Teachers\*

Supervision of Pupils\*

Use of reasonable force

If staff have any concerns about a colleague they may refer to the whistleblowing protocols on pages 10 and 11 of this policy document for advice on ways to report reasonable concerns.

## Appendix 3

### Prevent duty guidance

This statement takes into account the following documents:-

- Prevent Duty Guidance: for England and Wales, issued by HM Government in June 2015, updated March 2016 to reflect the duty in the Counter Terrorism and Security Act 2015 and its later revision
- Keeping Children Safe in Education, DfE September 2019
- Working Together to Safeguard Children DfE July 2018
- The Use of Social Media for Online Radicalisation DfE July 2015

Further information on certain aspects of this guidance can be found in:-

- Child Protection and Safeguarding Policy
- Curriculum Policy
- Anti-Bullying and Cyberbullying Policy
- E-safety and ICT acceptable use Policy
- Missing or absconding pupils Policy

The Head and Designated Safeguarding Lead for Child Protection and Safeguarding are responsible for:-

- Understanding the risk of radicalisation
- Ensuring that staff understand the risk and build the capability to deal with it
- Communicating and promoting the importance of the Prevent duty
- Ensuring that staff implement the Prevent duty effectively to avoid pupils being drawn into terrorism. This is achieved through staff training so that, as in all child protection matters, the staff have the confidence to identify children at risk
- Providing a safe environment in which pupils can understand and discuss sensitive topics, including terrorism and extremist ideals that are part of terrorist ideology

Key definitions are:-

- **Extremism** = the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Also included in this definition is the call for the death of members of the armed forces, whether in this country or overseas. For example, currently, Islamist extremists regard Western intervention in Muslim-majority countries as a “war with Islam”. In their view people cannot be both Muslim and British and Muslims living in this country should not participate in our democracy. Islamist extremists specifically attack the principles of civic participation and social cohesion.
- **Interventions** = projects intended to divert people who are being drawn into extreme activity. They can include monitoring, counselling, theological support, encouraging civic engagement and developing support networks, such as peer structures and communities with the boarding houses.
- **Prevention** = reducing or eliminating the risk of individuals becoming involved in extremism. It also includes but is not confined to the identification and referral of those at risk of being

drawn into extremism into appropriate interventions. These interventions aim to divert vulnerable people from radicalisation.

- **Radicalisation** = the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** = an extremist action that endangers or causes serious violence to a person or people, causes serious damage to property, or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. The most significant terrorist threat is presently from Syria and Iraq and Al Qa'ida associated groups. However, terrorists linked with the extreme right also pose a threat to safety and security.

King Edward's School Witley will fulfil its duty under the terms of the Prevent Guidance. This will be achieved in a number of ways:-

- King Edward's School provides a broad and balanced curriculum which promotes, amongst other things, the spiritual, moral, cultural and social development of pupils and prepares them for their responsibilities in adult life.
- A spirit of community cohesion is promoted. This begins at the level of the major pastoral unit, the boarding house, in which all members know each other well, and widens to the whole school community. The School is of such a size that all members of the community can be known by each other.
- The promotion of fundamental British values is encouraged as part of the education that is provided. This is manifest in PSHE lessons, tutorial discussions, Head's Assembly and Chapel services.
- Open discussion is encouraged in a number of places so that extreme ideas can be freely challenged. It is a requirement that all teachers present political issues in a balanced way that forbids political indoctrination. Staff are reminded of these responsibilities as part of the child protection training that they receive and are required to challenge extremist ideas.
- The School has robust safeguarding policies, reviewed annually by the SMT and governors, to identify pupils at risk and to supply the necessary intervention. The nature of the governing body, with its strong association with The City of London and firm adherence to the concept of fundamental British values, provides a clear filtering mechanism.
- Visiting speakers are invited by staff, perhaps at the suggestion of pupils, but their suitability is always assessed and they are appropriately supervised at all times.
- Every effort will be made to ensure that groups with links to terrorism do not use the School's buildings and resources.
- The School will always take into account the advice that is given by local and other counter terrorism agencies and will work in partnership with them whenever any concerns arises.
- The Director of ICT has clear policies and practice in place to ensure that pupils are safe from terrorist and extremist material when they access the internet at School. There are appropriate levels of filtering through Securus.

**A risk assessment to show that due consideration is given to the Prevent duty**

Nature of the risks	Level of risk	Actions taken to minimise the risk
A pupil applying for admission to the School for motives other than education	Medium	The Admissions Department pays close attention to all applications, but is even more precise in the review of applicants from Syria, Iraq or other predominantly Muslim areas. A business relationship is established with the family, agency or other charitable partners, and all protocols are followed precisely in the application for a visa. House staff are informed specifically of the needs of all pupils and the potential risks that they may face. Separate risk assessments are drawn up for each request to attend a mosque only after careful consideration of its suitability. There remains at all times the clear expectation that all applicants to the School will align with its clear Christian ethos.
Any pupil becoming indoctrinated whilst at School	Low	The checks that are in place on curriculum delivery, such as learning walks, lesson observations and the oversight of curriculum delivery by a Head of Department should prevent problems in lessons. The level of ICT protection should prevent research and communication on the school network. A climate of open discussion and the presence of a number of staff to whom pupils can speak provide the opportunity for concerns to be raised readily. Robust safeguarding policies are in place. The House staff are extremely experienced providers of pastoral care and are alert to changes in patterns of behaviour.
A day pupil becoming indoctrinated whilst at home	Medium	The School has less control over what day pupils do at home under the care of parents/guardians. However, by building a good relationship with parents/guardians and encouraging conversation with them, significant information can be conveyed. Focussed safety meetings and regular communication in the Head's newsletter provide due awareness of the School's ethos and expectations. The liaison with partners provides understanding of the level of risk in the local area. Robust safeguarding policies are in place
A pupil becoming indoctrinated during a holiday period	High	There is a clear risk that when pupils return to their home land and the lower level of supervision that might be able to be provided by parents, the risk increases. Information to parents can help, but their level of English may not be great enough to appreciate the significance of the message. Robust safeguarding policies are in place. House staff hold return to School conversations with pupils to help to keep them alert to any changes in behaviour patterns that could be emerging.

*Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism* (HM Government, updated April 2015) will be followed in consideration of the risk of a pupil being drawn

into radicalisation. On balance, after due consideration by the Senior Management Team at its meeting on Thursday 6<sup>th</sup> June 2019, it is agreed that the net level of risk is one that can be managed.

## Appendix 4

### Adaptation of Safeguarding and Child Protection procedures and systems in response to COVID-19

**April 2020**

#### **Response to COVID-19**

There have been significant changes at King Edward's School in response to the outbreak. Many young people are now at home and staffing is likely to be significantly affected through illness and self-isolation.

Despite the changes, the School's Child Protection Policy is fundamentally the same: **children and young people always come first, staff should respond robustly to safeguarding concerns and contact the Designated Safeguarding Lead (DSL), Head or LADO in line with our established safeguarding procedure.**

This appendix sets out some of the adjustments we are making in line with the changed arrangements in the School and following [advice from government](#) and local agencies. This Appendix uses the terms "child" (or "children") and "pupils" in acknowledgement of the statutory duty to protect all children and young people from harm. Attempts have been made to distinguish between situations that are likely to involve children attending King Edward's School – "pupils" – and other children but, in all cases, the underlying assumption is that a duty of care exists from School staff to all children.

#### **The School's current position and local advice**

The School site is currently closed to pupils. Nevertheless, the needs of all children and young people, their views and those of their parents and carers are being actively monitored. Risk assessments will be undertaken where appropriate, to include

- the potential health risks to all members of the School community and those resident on site from COVID-19, bearing in mind any underlying health conditions. This must be on an individual basis with advice from an appropriate health professional where required
- the risk to pupils if some or all elements of their Early Help plan, or in-house equivalent (e.g. Pastoral Care Plan), cannot be delivered at all, and the risk if they cannot be delivered in the normal manner or in the usual setting
- the ability of the individual's parents or home to ensure their health and care needs can be met safely

(adapted from <https://www.gov.uk/government/publications/coronavirus-covid-19-guidance-on-vulnerable-children-and-young-people/coronavirus-covid-19-guidance-on-vulnerable-children-and-young-people>)

#### **Reporting arrangements**

The School arrangements continue in line with our child protection policy. The School aims to ensure the DSL or a deputy is always on site while the School is open. In any unusual circumstance where this is not possible the DSL or a Deputy DSL (DDSL) will be contactable and the Head or a member of the Senior Leadership Team will email all staff by 9am to advise they are acting in an on-site safeguarding role together with contact details for the DSL or Deputy DSL.

Staff and, in particular, Housemasters and Housemistresses will continue to follow Child Protection procedures and advise the (D)DSL immediately about concerns they have about any child, whether in School or not. COVID-19 effectively requires increased vigilance due to the pressures on services, families and young people, rather than a reduction in our standards.

Children's services may be affected by the impact of the virus on staff and an increased demand for services. Where a child is at risk of significant harm there may be a need to be persistent in referring concerns to the local authority. The arrangements for contacting children's services and the LADO office are unchanged:

**Surrey County Council Children's Services**      0300 470 9100  
**Multi-Agency Partnership**                      01483 517 898 (emergency out-of-hours team)  
**Single Point of Access (C-SPA)**                [csmash@surreycc.gov.uk](mailto:csmash@surreycc.gov.uk)  
National Society for the Prevention of Cruelty to Children (NSPCC)  
helpline: 0808 800 5000                      or            email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

*For allegations against staff working in Schools:*

**Local Authority Designated Officer (LADO)**      0300 123 1650 (option 3) [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk)

Should a child, in the School's view, be at risk of significant harm and local agencies are not able to respond, the School (usually the DSL) will immediately follow Surrey Safeguarding Children Partnership's escalation procedure. In these cases, escalation would be to the senior officers:

Executive director for nursing, quality and safeguarding in health  
Chief Executive Officer in Surrey County Council  
Chief Constable in Surrey Police  
Independent Review Service - [irunit.duty@surreycc.gov.uk](mailto:irunit.duty@surreycc.gov.uk)  
Child Protection Unit - [cpunit.duty@surreycc.gov.uk](mailto:cpunit.duty@surreycc.gov.uk)

### ***Identifying vulnerability***

We have undertaken a scoping exercise to identify the most vulnerable pupils. Using the School's "Levels of Concern" document as a basis, the Safeguarding Committee (with further input from Housemasters and Housemistresses) has identified those children most likely to be affected by a prolonged stay at home or with carers, paying particular attention to those Foundation pupils identified as having a boarding need. The "Levels of Concern" document has been updated accordingly.

In the case of looked after children, those who have a social worker and those on the edge of social care involvement, and any other pupil deemed vulnerable by the Safeguarding Committee, their Housemaster or Housemistress is in frequent, regular contact both formally and informally. There are no pupils at King Edward's School who are subject to a child protection plan or EHCP. The School anticipates providing care for pupils who have a social worker, by agreement with the latter, from the start of next term.

These arrangements will be reviewed and consideration given to closer care, including the possibility of providing care on site.

### ***Holiday arrangements***

King Edward's School is not currently providing care for the children of any key workers. This situation may change, in which case, a revised version of this document will be produced.

### **Attendance**

The School will follow the [attendance guidance issued by government](#). Where a pupil is expected and does not arrive, the School will follow our attendance procedure and make contact with the family. If contact is not possible by 9:30am the DSL must be informed. The DSL will attempt a range of methods to contact the parent (Skype, FaceTime, through a relative etc) but, if necessary, arrange a home visit by the School or another appropriate agency. A risk assessment will be undertaken to consider and manage the implications of COVID-19 alongside other risks perceived to the child. The risk of COVID-19 **does not override** the duty on the School to ensure children and young people are safe.

The School will also follow the attendance procedure if contact proves impossible with pupils at home through close liaison and cooperation with external agencies including police and social services.

Staff will be made aware of increased risk.

The pressures on children and their families at this time are significant. There will be heightened awareness of family pressures through being contained in a small area, [poverty](#), and financial or health anxiety. These areas are being considered in the context of any work for pupils to undertake at home (including recognising the impact of online learning – see below), and an appropriate remote curriculum drafted in anticipation of an extended period of remote learning. Staff will be aware of the mental health of both [pupils](#) and their [parents and carers](#), and must inform the DSL of any concerns.

### **Peer on peer abuse**

We recognise the potential for abuse to go on between young people, especially in the context of a School closure or partial closure. Our staff (especially but not only House staff) will remain vigilant to the [signs of peer-on-peer abuse](#), including those between young people who are not currently attending our provision. Extra care will be taken where groups have mixed age, developmental stages, are attending other Schools as an interim measure and similar. When making contact with these families our staff will ask about relationships between learners.

The issue of peer-on-peer abuse is well addressed by staff through InSeT during the year and forms part of the School's ongoing PSHE curriculum. In the event of an extended period of remote learning, provision will be made to include PSHE in the remote learning curriculum.

### **Risk online**

Young people will be using the internet more during this period. The School may also use online approaches to deliver training or support. Staff will be aware of the signs and signals of [cyberbullying](#) and [other risks online](#) and apply the same child-centred safeguarding practices as when pupils were learning at the School.

- The School continues to ensure [appropriate filters and monitors are in place for all applications used for remote learning](#). The Safeguarding governor will monitor this as part of an overarching responsibility to assess the effectiveness of all safeguarding procedures
- The School has taken on board guidance from the [UK Safer Internet Centre](#) on safe remote learning and guidance for [safer working practice](#) from the Safer Recruitment Consortium. We have issued a code of conduct for remote learning, accordingly.
- Staff have discussed the risk that professional boundaries could slip during this exceptional period and been reminded of the School's code of conduct and importance of using School systems to communicate with pupils and their families.
- Staff have read the [20 safeguarding considerations for livestreaming](#) prior to delivering any livestreamed sessions

King Edward's School pupils have received guidance on keeping safe online and know how to raise concerns with the School. During this time of remote learning, the School will not ask pupils to interact with anyone from outside the School community.

In case of concern, other child-protection resources to contact include:

[Childline \(0800 1111\)](#)  
[UK Safer Internet Centre](#) and  
[CEOP](#).

In addition, parents and carers should make a note of the following resources to keep their children safe when online:

- [Internet matters](#) - for support for parents and carers to keep their children safe online
  - [London Grid for Learning](#) - for support for parents and carers to keep their children safe online
  - [Net-aware](#) - for support for parents and carers from the NSPCC
  - [Parent info](#) - for support for parents and carers to keep their children safe online
  - [Thinkuknow](#) - for advice from the National Crime Agency to stay safe online
  - [UK Safer Internet Centre](#) - advice for parents and carers
- Free additional support for staff in responding to online safety issues can be accessed from the [Professionals Online Safety Helpline at the UK Safer Internet Centre](#).

#### ***Allegations or concerns about staff***

With such different arrangements young people could be at greater risk of abuse from staff or volunteers. We remind all staff to maintain the view that 'it could happen here' and to immediately report any concern, no matter how small, to the safeguarding team (as above and in the Safeguarding Directory).

Any staff or volunteers from outside our setting will complete an induction to ensure they are aware of the risks and know how to take action if they are concerned.

The School has confirmed that the arrangements to contact the LADO at the local authority remain unchanged (as above).

If necessary, the School will continue to follow the duty to refer to DBS any adult who has harmed or poses a risk of harm to a child or vulnerable adult, and to the Teacher Regulation Agency in line with paragraph 166 of Keeping Children Safe in Education 2019 using the address [Misconduct.Teacher@education.gov.uk](mailto:Misconduct.Teacher@education.gov.uk).

#### ***New staff or volunteers***

No new starters are expected to be recruited. However, in this event, they must have an induction before starting or on their first morning with the DSL or a deputy. They must read the School Child Protection policy, the Behaviour Policy, the Whistleblowing Policy and the Staff Code of Conduct in the Employment Handbook. The (D)DSL will ensure new recruits know whom to contact if worried about a child and ensure the new starters are familiar with child protection procedures.

If staff or volunteers are transferring in from other registered education or childcare settings for a temporary period to support the care of pupils, we will seek evidence from their setting that:

- the member of staff has completed relevant safeguarding training in line with other similar staff or volunteers,
- they have read Part I and Annex A of Keeping Children Safe in Education, and
- where the role involves regulated activity, and the appropriate DBS check has been undertaken by that setting, we will undertake a [written risk assessment](#) to determine whether a new DBS would need to be undertaken. It may be in these exceptional times we can rely on the DBS undertaken by their setting.

Our child protection procedures hold strong:

- Volunteers may not be left unsupervised with pupils until suitable checks have been undertaken. People supervising volunteers must be themselves in regulated activity, able to provide regular, day to day supervision and reasonable in all circumstances to protect the pupils.
- The School will undertake a written risk assessment on the specific role of each volunteer to decide whether to obtain an enhanced DBS check (with barred list information) for all staff and volunteers new to working in regulated activity in line with [DBS guidance](#).
- When undertaking ID checks on documents for the DBS it is reasonable initially to [check these documents online](#) through a live video link and to accept scanned images of documents for the purpose of applying for the check. The actual documents will then be checked against the scanned images when the employee or volunteer arrives for their first day.
- The School will update the Single Central Record of all staff and volunteers working in the School, including those from other settings. This will include the risk assessment around the DBS. A record will be kept by the HR Department of who is working in the School each day.

### ***New children at the School***

It is not anticipated that children will join our School from other settings. However, should this occur, we will require confirmation from the DSL whether they have a Safeguarding File or SEN statement/EHCP. This file must be provided securely **before** the child begins at our School and a call made from our (D)DSLs to the placing School's DSL to discuss how best to keep the child safe. In some unusual circumstances this may not be possible. Information provided must include contact details for any appointed social worker and where relevant for the Virtual School Head. Safeguarding information about children placed in our School will be recorded on our safeguarding system, will be securely copied to the placing School DSL and will be securely returned to the placing School on completion of the child's placement with us so there is a continuous safeguarding record for the child.

The DSL will undertake a risk assessment in respect of any new information received, considering how risks will be managed and which staff need to know about the information. This will be recorded on our safeguarding recording system.

This policy has been remotely approved by Governors on 21/4/2020 and is available on the School website and Firefly.