King Edward's School, Witley
Child Protection and Safeguarding Policy

Contents

Safeguarding Directory for adults

For safeguarding and child protection concerns and when you know something is wrong

If you think that a child is in immediate danger, or that a crime has been committed, ring (9) 999 before doing anything else.

Any safeguarding or child protection concerns should be raised with the Designated Safeguarding Lead (DSL), any of the Deputy DSLs or the external agencies listed on this page. Even minor concerns should be raised because they may be part of a bigger picture unknown to staff members.

DSL			
Mr Ian Richardson (Head of Keyboard)	richardsoni@kesw.org	07497 093502	(ext 715)
Deputy DSLs			
Mrs Emily Campbell (Head of Classics)	campbelle@kesw.org	07946 008240	(ext 776)
Mr David Corran (Deputy Head)	corrand@kesw.org	01428 686 748	(ext 748)
		07460 173 023	
		01428 483 359	(home)

All the DSLs can be reached via the generic email address safeguarding@kesw.org and can be contacted by using extension 777 from a School phone

Head	**Mrs Joanna Wright**	wrightj@kesw.org	01428 686 743 (ext 743)
			01428 686 721 (ext 721)
DOFO*	**Mr Dan Rogers**	rogersd@kesw.org	01428 686 778 (ext 778 or 414)
Treasurer	**Mrs Justine Voisin**	treasurer@kesw.org	
Safeguarding Governor	**Mr Clive Marriott**	headmaster@salisburycathedralschool.com	
Deputy Governor	**Ven Stuart Beake**	StuartBeake@guildford-cathedral.org	

*DOFO: Director of Finance and Operations

Anyone with a concern about a child can get advice from, or make a referral to, the local authority:

Surrey County Council Children's Services	0300 470 9100, or
Multi-Agency Partnership	01483 517 898 (emergency out-of-hours team)
Single Point of Access (C-SPA) and Early Help Hub	cspa@surreycc.gov.uk
NSPCC helpline: 0808 800 5000 or email:	help@nspcc.org.uk

For allegations against staff working in schools, normal procedure is to refer to DSL or Head (as per Safeguarding policy) but anyone may make an independent referral to the **Local Authority Designated Officer (LADO)** 0300 123 1650 (option 3) LADO@surreycc.gov.uk

What to do if you feel your concerns are not being acted upon, or if you are concerned about unsafe practice or malpractice by the DSL or wider safeguarding team?
A member of staff who has raised a concern with the DSL or Deputy DSLs, DOFO, Head, Treasurer, governor, or the local authority, should expect a confirmatory response within one working day. Should that not be forthcoming, staff should seek it out. In addition, they should press for further consideration if the child is at risk or if the situation is not improving. If staff feel their concerns have not been fully addressed (having paid due regard to the need for professional confidentiality), or that actions taken are partly or completely ineffective, they should speak to the Head in the first instance and then the Treasurer if they are still not satisfied. Further details can be found in the Whistleblowing Policy, as quoted in the Staff Employment Handbook*,* which is available on Firefly or as a hard copy on request from HR.

Staff who do not feel able to speak up about child protection failures internally, or who think their concerns about the safeguarding regime are not being addressed, may seek advice from, or pass concerns to, the LADO, C-SPA or the NSPCC (all as listed above, as appropriate) at any time.

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

1. **All adults working in King Edward's School, including governors, contractors and volunteers, 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 (DSL) and the Deputy DSLs**
    *   **know, understand and follow the relevant sections of KCSIE (2022), the School's Child Protection Policy and related procedures.**
    All staff have a duty to report any child protection concerns to one of the DSLs.

2. **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 Local Authority Children's Social Care, if necessary. Referrals to statutory agencies do not require parental consent. The 'Safeguarding Directory for Adults', on page 3 of this policy, explains how to do this in further detail.**

3. **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, Sex and Health Education (RSHE) since 2020, PSHE and in ICT. Particular attention is given to the safe use of electronic devices and the internet.**

General points

4. Ian Richardson, Head of Keyboard (richardsoni@kesw.org), is the DSL and therefore takes overall responsibility for the School's Child Protection and Safeguarding procedures and systems. Children's safety, welfare and wellbeing remain the responsibility of all staff however.

5. All the School's systems and procedures operate with the best interests of the child at heart; we will work hard to enable children to be heard, know that they are heard and to let us know what is happening to them.

6. 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 headmaster@salisburycathedralschool.com; the Venerable Stuart Beake has been appointed Deputy Safeguarding Governor. He can be contacted at StuartBeake@guildford-cathedral.org. One or both of these meet each term with the Deputy Head and report 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. KCSIE (2022) is clear that the governing body has strategic responsibility for safeguarding arrangements at the School. The Head is responsible for ensuring staff understand and follow the procedures agreed by the governing body.

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

8. 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 meaning of 'safeguarding' and 'child protection'

9. There are **four** elements within the government's definition of safeguarding. **Two** of them, **(a)** "Ensuring that children grow up in circumstances consistent with the provision of safe and effective care" and **(b)** "taking action to enable all children to have the best outcomes", refer to the general activity of safeguarding and promoting the welfare of every single one of our pupils.

10. The School recognises that children have a right to feel safe and secure and cannot learn effectively unless they do. We also recognise the statutory responsibility of each and every member of staff to provide a safe environment for children, and that this principle is especially important in a boarding school and in caring for vulnerable children according to the School's mission. In this sense 'safeguarding' is an overarching concept incorporating a number of areas covered in separate policies including our recruitment methods, security arrangements, health & safety practice, the management of our computer network.

11. We also aim to teach our pupils how to look after themselves and each other. To that end we use tutorials, assemblies, PSHE (Personal, Social and Health Education) and Relationship and Sex Education (RSE) and Health Education sessions to educate pupils about safeguarding, consent, and how they can recognise and build resilience to various forms of bullying and abuse, including child-on-child abuse. We aim to teach them about the risks posed by adults and children who use methods including the internet, mobile technology and social media to bully, groom, exploit, abuse or radicalise other people. We also aim to teach our pupils to understand and appreciate the fundamental values of democracy, the rule of law, individual liberty, and mutual respect for and tolerance of those with different faiths and beliefs. Finally, we aim to help pupils make a safe transition to the world of higher education and work. Additionally, using surveys, pupil forums and tutorials, and the Peer Listening initiative, we aim to listen to our pupils' views about their safeguarding, and to respond accordingly.

12. The **second two** of the four parts within the definition of safeguarding are **(c)** "protecting children from maltreatment" and **(d)** "preventing impairment of children's mental and physical health and development". These relate to the more specific activity of child protection, which means working to protect particular children from abuse and neglect. This is sometimes predictive, meaning identifying children at risk and addressing their needs

before they become serious problems, and sometimes reactive, meaning responding quickly and effectively to the needs of children who have already been identified as suffering.

13. The School's approach to child protection issues is in accordance with the inter-agency procedures in Surrey between Local Authority Children's 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:

14. The 'Children's Safeguarding Partnership' in Surrey is established and led, jointly and equally, by Surrey County Council, Surrey Police, and Guildford & Waverley Clinical Commissioning Group (on behalf of all NHS providers in Surrey). Schools (including independent schools) have become 'Relevant Agencies', and as such are required to act in accordance with the Partnership's arrangements and to contribute to their operation. At the moment the Surrey Safeguarding Children Partnership ('SSCP') is based at SSCP Team, Quadrant Court, 35 Guildford Road, Woking, Surrey GU22 7QQ, and can be reached at partnership.team@surreycc.gov.uk. DSLs will liaise with the Safeguarding Partners and work with other agencies. They are familiar with the document "NPCC – When to call the police" and will use it for guidance when considering when to call the police and what to expect when they do so. For the time being the SSCP is continuing to use the web address of the old safeguarding board's *Procedures Manual*:

    http://surreyscb.procedures.org.uk/page/contents

15. The School has adopted a document from Surrey Safeguarding Children's Partnership called "Effective Family Resilience (Levels of Need)" document. The School's procedures and systems relating to this document and approach are described in Appendix 4.

16. 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. Pastoral staff consider this contextual approach to safeguarding regularly, both informally and, formally, in Housemaster/ Housemistress meetings and in the Pupil Wellbeing Committee. The outcomes and actions resulting are recorded.

17. All staff have been made aware that SEND pupils (and others as detailed in the following paragraph) may be at additional risk of harm and can be more prone to peer group isolation or bullying (including prejudice-based bullying) than other children. There is potential for children with SEND or certain medical conditions to be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs and there are associated communication barriers and difficulties in managing or reporting these challenges. In order to minimise these risks, the Pupil Wellbeing Committee (comprising DSL, Deputy DSLs, SENDCO, Assistant Head (Diversity, Inclusion and Wellbeing), Medical Centre Manager, Chaplain, Counsellor and Housemasters/ Housemistresses) meet each week to consider all vulnerable pupils 'in the round'.

Barriers to reporting:

18. All staff should be aware that children may delay in reporting a concern or prevent a concern from being raised, they may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or worry about being threatened

(*"snitches get stitches", "snake"* and other such terms, any of which should be reported by any staff who hear them, and dealt with appropriately). This could be due to their vulnerability, disability and/or sexual orientation, difficulties in communication or language barriers. They may also worry that School staff will overreact (this was a fear expressed in a recent survey). None of these should prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication. Pupils from a social background that makes them vulnerable (whether by perception or by circumstances) may well worry further that they will be victims of discrimination on the basis of race, sexuality, disability or academic attainment. At KESW we are particularly sensitive to the greater vulnerabilities of Foundationers and children on the SEND register.

19.   There may be barriers to reporting that affect staff and other adults. In particular, a lack of faith in the system and associated belief that the damage caused by a process will outweigh any benefit to a child. Also, many adults believe (in error) that GDPR concerns are a barrier to sharing personal information. The legislation is clear that fears about sharing information **must not** be allowed to stand in the way of acting to safeguard children.

20.   Reporting concerns: The "Safeguarding Directory for Adults" explicitly and clearly addresses this matter. Staff must report all concerns about pupils to the DSL or Deputy DSLs at the earliest opportunity using CPOMS or the contact details provided in the Directory on page 3. Pupils, parents and others should contact the DSL or Deputy DSLs in a timely fashion.

21.   Staff must never cover up concerns about children, delay reporting them or ignore them. Teachers' professional responsibilities include the safeguarding of children. However, their role is not to investigate safeguarding issues or make judgements about them. Their job is to share concerns quickly. They may need to use their professional judgement to determine whether explanations provided to them satisfactorily account for what they have observed. This is why all staff must have a good understanding of the sorts of concerns that may be presented, as fully explained in KCSIE (2022).

22.   Local authorities should share the fact that a child has a social worker. In this situation, the DSL(s) will hold and use the information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.

23.   In addition to this Policy and advice, reference can be made to *Keeping Children Safe in Education*, DfE September 2022 (KCSIE 2022) and *Working Together to Safeguard Children* (WTSC July 2018) which give detailed help and advice. Reference can also be made to the School's "Sex Education and Relationships Education" Policy. 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. These matters are more fully covered in the policy document "Contact between staff and students" (available on the internal network called "Firefly" or by application to the Deputy Head). These documents provide details 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

24. Staff must read and understand Keeping Children Safe in Education (September 2022) as follows:

- **Everyone** should read & understand their responsibilities as described in part 1, part 5 and Annex A
- **All staff with direct contact** with children should read Annex B
- **Head and DSLs** should read the whole document (DSLs should ensure Annex C is included in their job description)
- **Governors** should read part 2 as a minimum, but be aware they are responsible for compliance in parts 3,4,5.
- **Designated safeguarding governors** should read the whole of the guidance
- Anyone involved in **recruitment and / or SCR** (including recruiters / managers of volunteers should read part 3 + annex E
- Anyone involved in **MFL / other school exchanges** should read part 3 paras 334-339 and Annex E
- **HR Department** should read it all but concentrate on parts 3 & 4 + Annex F
- Anyone in **classroom based** roles, **ICT, network staff** should read Annex D

The Treasurer, additionally, undertakes to read the whole of KCSIE.

25. Staff may 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

26. 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 1 of this document.

27. 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 those elements listed above, 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 this Child Protection and Safeguarding Policy which contains staff behaviour protocols, whistleblowing procedures, online safety, and the identity and role of the Safeguarding Leads. All staff are trained to manage a report of child-on-child sexual violence and sexual harassment. 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.

28.   The School operates safe recruitment procedures in accordance with the requirements of the Disclosure and Barring Service as laid down in KCSIE 2022; these procedures are also in accordance with the Independent School Standards Regulations. 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 a separate policy.

29.   The School has clear procedures in place to deal promptly with allegations of abuse that are made against members of staff, volunteers or the Head. In summary, such allegations would normally be directed to the Head[1] in the case of any member of staff or volunteer, and to the Treasurer (Chair of Governors) in the case of the absence of the Head, or an allegation against the Head. In the latter case, the Head will not be informed of the allegation. Where there is a conflict of interest in reporting the matter to the Head, the allegation should be made directly to the LADO. 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 KCSIE 2022, the Head is required to consult the Local Authority Designated Officer within 24 hours and before any investigation is undertaken on any matters relating to allegations against a member of staff meeting the threshold for harm[2]. 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. Suspension might be used: as a neutral act, to protect the member of staff or child/children, or to allow an investigation to proceed unhindered by the presence of a member of staff on the School site. The School's response to allegations against supply staff provided by an agency will fully involve that agency.

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[1] Or the DSL in the case of low-level allegations (see below).
[2] **Allegations that may meet the harm threshold.**
These are allegations that a person who works with children has behaved in a way that has harmed a child, and/or
- possibly committed a criminal offence against or related to a child, and/or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.
An allegation may relate to an adult's behaviour outside School.

30.   In cases where the allegation is found to be unfounded, false, malicious or unsubstantiated, the case manager (and, if they have been involved, the LADO) should consider the facts and determine whether and lessons can be learned and if improvements can be made.

Low-level concerns:

31.   The School wishes to create and maintain a culture and procedures in which all concerns about adults, including allegations that do not meet the harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately. Such concerns are known as "low-level concerns". The Head and DSL inform and consult each other on all low-level concerns with appropriate confidentiality. They record concerns in a secure area, record any investigations, upload relevant documents and produce reports when necessary. This is in the interests of maintaining a full picture of behaviour, to inform consultation with the LADO and other external agencies, and to identify concerning, problematic or inappropriate behaviour early. It will also guard against 'drift', in which one aspect of the School gradually slips away from approaches agreed by the organisation as a whole, and ensure that adults working in the organisation are clear about professional boundaries and act within them in accordance with our ethos and values.

32.   The term "low-level concern" does not mean that the concern is "insignificant" but that it does not clearly meet the "harm" threshold (quoted above) and/or that it is inconsistent with the School's Code of Conduct, ethos and values and/ or that it is of concern, causes unease or a 'nagging doubt'. Such concerns should be reported to the DSL or to the Head who will record it, log any subsequent actions and their rationale.

33.   Staff do not need to be able to determine in each case whether their concern is a low-level concern, or if it is not serious enough to merit a referral to the LADO, or whether it meets the threshold of an allegation. Once staff share what they believe to be a low-level concern, that determination should be made by the Head or the DSL.

34   Examples of low-level concerns might include (but are not limited to): being over-friendly with children; having favourites; engaging with a child one-to-one in a secluded area; using humiliating language (e.g sexualised, intimidating or offensive language). These examples exist on a wide spectrum, from behaviour that is seemingly harmless, to seemingly inappropriate behaviour that is innocent in its intention. However, on the other end of the spectrum, it could be behaviour that is intended to enable abuse and grooming in the future.

35.   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.

36.   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."

37.   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.

38.   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?

39**.**   **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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.**

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

41.   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:

42.   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" abuse of all types includes crimes and violent 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.

43.   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:

44.   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 child-on-child abuse. Some level of emotional abuse is present in all types of ill treatment of a child although it may occur alone.

45.   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:

46.   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.

47.   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

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

Neglect:

49.   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.

50.   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

51.   If a child is suffering from any of the above, they are likely to also exhibit signs of stress and distress.

52.   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.

Missing education can be a sign of child criminal exploitation including involvement in county lines.

Child Sexual Exploitation:

53.   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.

54.   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.

55.   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

56.   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.

57.   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:

58.   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

Youth-involved sexual images (sexting):

59.   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

60.   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 Local Authority Children's 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. Further information may be found in the Antibullying and cyberbullying Policy and in the Child-on-child Abuse Policy and Appendices. Further details about pupils' use of mobile technology in the School may be found in the "E-safety and ICT Acceptable Use Policy" on Firefly (the School's VLE).

61.   All responsible adults in School should be aware of further, specific forms of abuse and safeguarding issues as follows:

- Child abduction and community safety incidents which may be committed by parents or other family members, by people known but not related to the victim and by strangers;
- Other community safety incidents should raise concerns, e.g. people loitering nearby or unknown adults engaging children in conversation. In PSHE lessons, tutor periods and other assemblies, pupils receive practical advice on how to keep themselves safe.
- Children in the court system: the School is ready to provide support to children of all ages when they are required to give evidence in criminal courts.
- Children with family members in prison: the School's unique foundation means that we have had to give specific thought to this question. We are aware that such children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. We are ready to provide support and links to support professionals, to help mitigate negative consequences for those children.
- Modern Slavery and the National Referral Mechanism: Modern Slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further support is available at www.gov.uk, "modern slavery; how to identify and support victims".
- Homelessness: the School is aware of the risks and the reality of children's homelessness. The DSL will make referrals to the Local Housing Authority and/or Children's Local Authority Children's Social Care and Social Services.
- Forced marriage: adopting the mantra that "it could happen here", we are aware of the physical, emotional and psychological threats involved in forced marriage. Forced marriage is one entered into without the full and free consent of one or both parties, and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage.

Child-on-child abuse:

62.   **The School has a Child-on-child Abuse Policy which should now be the principal document to consult in this area. In summary, however, the following paragraphs are relevant:**

63.   Child-on-child abuse is any form of physical, sexual, emotional and financial abuse, and coercive control exercised between children, and within children's relationships (both intimate and non-intimate), friendships, and wider peer associations. Physical abuse can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm. Child-on-child abuse can take various forms, including (but not limited to): serious bullying (including cyberbullying), relationship abuse, domestic violence and abuse, child sexual exploitation, upskirting, initiation/ hazing-type rituals and violence, youth and serious youth violence, harmful sexual behaviour and/or prejudice-based violence including, but not limited to, gender-based violence. Online child-on-child abuse is any form of child-on-child abuse with a digital element, for example, sexting, online abuse, coercion and exploitation, child-on-child grooming, threatening language delivered via online means, the distribution of sexualised content, and harassment.

64.   It is difficult to distinguish child-on-child abuse from bullying and other forms of unacceptable behaviour but as a working definition at King Edward's School, Witley, behaviour that results in the victim displaying signs of abuse is deemed to be child-on-child abuse even if the behaviour could have been considered by some to be 'banter' or simply a childish joke. It is more likely, but not universally true, that girls will be victims and boys perpetrators. All such abuse is unacceptable, will be treated seriously by the School and due attention paid to the successful resolution of the situation.

65.   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 their knowledge and/or permission to view their genitals or buttocks (with or without underwear) for sexual gratification or to cause humiliation, distress or alarm to 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 DSL or one of the Deputies. The options include managing the matter internally, seeking Early Help intervention, referring to Surrey C-SPA and reporting to the police. Whenever staff respond to incidents of abuse in any form, they must reassure the victim that they are being taken seriously, they will be supported and kept safe. No victim should be made to feel ashamed to make a report.

66.   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 child-on-child abuse. All staff are clear that sexual violence and sexual harassment are not acceptable and not an inevitable part of growing up; they will not tolerate instances of these behaviours or dismiss them as "banter", "having a laugh", or "boys being boys". Developmentally inappropriate sexualised behaviours will always be challenged as soon as staff become aware of them.

67.   Terminology: "victims" and "perpetrators"
        To facilitate communication, School staff members may use these terms. We recognise that not everyone who has been subjected to abuse considers themselves to be a victim or would

want to be described in that way. We will endeavour to use a term with which the individual child is comfortable. Similarly, the terms "perpetrator" and "alleged perpetrator" are widely used and recognised. They may be appropriate to aid drafting of guidance. However we will endeavour to be careful about terminology especially when speaking to children and parents of children involved not least because the abusive behaviour may well have been harmful to the perpetrator as well as the victim. School staff members will use appropriate terminology as determined case by case.

68. **Cybercrime** is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber Dependent crimes include;

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

69. Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or DDSL), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety. Additional advice can be found at: Cyber Choices, 'NPCC-When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK.]

70. **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. It can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. 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

71.   Care must be taken when recognising abuse and neglect in pupils with special educational needs or disabilities as they can be disproportionally 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.

72.   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.

73.   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. Local Authority Children's 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

74.   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.

75.   At all times staff will consider the welfare of the children involved in any allegation or investigation as well as pursuing an investigation. When information is being gathered the Safeguarding Leads will be present, to support the pupil and explain what is taking place.

76.   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 Local Authority Children'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.

77.   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.

78.   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

79.   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

80**.   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

81.   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

82.   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 Operations 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.

83.   '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.

84.   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.

85.   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.

86.   Additionally a member of staff is at liberty to express any concern to the Head or the Director of Finance and Operations. 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 Operations will have a right to raise it in confidence with the governing body.

87.   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.

88**.**   **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.**

89**.**   **CONTACT TELEPHONE NUMBERS**

	Internal:	External:
Designated Safeguarding Lead person: **Mr Ian Richardson**	777	07497 093502
Deputy DSLs **Mr David Corran**	748/777	01428 686748 07460 173023
Mrs Emily Campbell	777	07946 008240
Head: **Mrs Joanna Wright**	710 and 743	01428 686743

90.   **Surrey Safeguarding Children Partnership (SSCP)**

The Surrey Safeguarding Children Partnership co-ordinates how children are safeguarded and protected from harm. 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: partnership.team@surreycc.gov.uk

Local Area contact for Waverley

- Duty Desk : 0300 123 1640

LADO

- Duty Desk: 0300 123 1650
- Email: LADO@surreycc.gov.uk

Useful contact

- SSCP Support Team
- Email: partnership.team@surreycc.gov.uk

91.   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
- Anti-terrorism hotline 0800 789 321
- If it is an emergency dial 999

92.   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.

93.   This policy is reviewed annually or more frequently if required by the Senior Management Team, the Deputy Head, the Governors' Pastoral Working Group, the Governor responsible for Child Protection and Safeguarding and then also by 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

Staff behaviour protocols

94.   For more detailed guidance, please refer to the "[Contact between staff and students](#)" Policy on Firefly.

Underlying principles

95.

- 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. In the case of an allegation about a colleague that they have:
  - behaved in a way that has harmed a child, or may have harmed a child;
  - possibly committed a criminal offence against or related to a child;
  - behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
  - behaved or may have behaved in a way that indicates they may not be suitable to work with children

96.   The School will refer the allegation to the LADO. This procedure relates to members of staff, supply staff, volunteers working in any school or college regardless of whether the school or college is where the alleged abuse took place. Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police.

Position of trust

97.   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.

Propriety and behaviour

98.

- 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

Physical contact

99. 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.

100. 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. Please refer to the School's"Use of Reasonable Force" Policy for further details.

Working in one-to-one situations with a pupil

101. 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

102. 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.

103. 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.

104. 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. Please also refer

particularly to the "Contact between staff and students" Policy which is on the School's VLE known as "Firefly".

- 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

105. If staff have any concerns about a colleague they may refer to the whistleblowing protocols on page 19 of this policy document for advice on ways to report reasonable concerns.

Appendix 2

Prevent duty guidance

106.   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 2022
- Working Together to Safeguard Children DfE July 2018
- The Use of Social Media for Online Radicalisation DfE July 2015

107.   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

108.   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

109.   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.

110. 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

111.

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.

112.   *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 it is agreed that the net level of risk is one that can be managed.

Appendix 3 "Levels of Need"

113. Surrey Children's Safeguarding Partnership publishes a document called Effective Family Resilience (known as 'Levels of Need') which sets out in detail the indicators, symptoms and behaviours which people who work with children must look out for constantly. It divides those into **four** levels of need. Every single person in Surrey who is under 18 will fit within one of the four levels.

114. Concerns about the wellbeing of any pupils should be shared with DSL or Deputy DSL (in person or via CPOMS) and will then be discussed at the Pupil Wellbeing Committee which meets once per week in term time with the following members:
DSL; Deputy Head (Academic); Deputy DSL; School Counsellor; Medical Centre Manager; SENCO; Chaplain

115. Discussion within this body, and effective use of CPOMS, should minimise the 'jigsaw' effect in which a number of colleagues hold information that, individually, may seem trivial but which, once put together become significant.

116. **Level One**: the large majority of children at KESW (and in Surrey more generally) are said to be at Level One, the lowest of the four Levels of Need, because they are developing and achieving outcomes as expected. As part of growing up, many children will have health concerns, family issues, academic worries or problems with peer relationships. It is a key part of the role of HsMs, and their teams to offer children and their families advice and information on support which is universally open to all pupils: Tutors and Matrons, the Special Educational Needs department, the Chaplaincy, the Medical Centre, Counsellor, NHS services, and so forth.

117. **Level Two**: if the DSL, working with the Pupil Wellbeing Committee (PWC), judges that the child's situation requires a more formal coordination of the School's internal services, he or she is said to be at Level Two. The Committee will identify a 'Lead Professional' who will have responsibility for assessing the pupil's needs and then writing, implementing and reviewing a Pastoral Care Plan (KESW's version of an Early Help Plan). The plan will be shared with the pupil and their parents, and others on a need-to-know basis, and with HsM whenever possible. The purpose of a PCP is to improve the child's situation by formulating a response, coordinating the work of colleagues, and regularly reviewing progress. If, on review, the pupil's situation does not seem to be improving, the Committee will consider escalation.

118. At **Level Three**, the child's needs are moving beyond what the School alone can provide. For example, the School's Medical Officer may have referred the pupil to CAMHS, or the SENDCO may have decided that specialised external support is required. If the DSL, working with the PWC and the Safeguarding Partnership's Effective Family Resilience document, judges that the child's needs might best be met by a mixture of the School's internal services working together with the targeted help provided by specialised exterior services, then the DSL will refer the child to Surrey Council's Early Help Hub using the Children's Single Point of Access (contact details on the Safeguarding directory for adults) or to services provided within the pupil's home area (if not Surrey). In most cases, written consent for a referral must be provided by parents, guardian or social worker, and the resulting Early Help Plan (local authority version) must include and be shared with them and the child. An Early Help review at which the parents and the professionals who are offering support to the pupil meet is called a TAF ('Team around the Family') meeting. Pupils with SEND whose needs cannot be met by the support at School may be most effectively helped through the creation of an EHCP (Education, Health and Care Plan)

written by the Local Authority with substantial input from members of staff at the School. Such plans are based on decisions made openly with parents, children and young people.

119. **Level Four**, the highest level of need, is a legal designation defined by Sections 17 and 47 of the Children Act 1989. The School must pass on to the local authority any possible Level Four concerns. Section 17 of that Act safeguards children who are 'in need', because their health or development would be weakened if they were not supported by specialised services. This includes children with serious disabilities or complex special educational needs. Under Section 47 of the Children Act, which covers **child protection**, the local authority must investigate when it becomes aware that a child is suffering (or is likely to suffer) significant harm.

Appendix 4 – Managing low level concerns

120.

Managing low level concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors
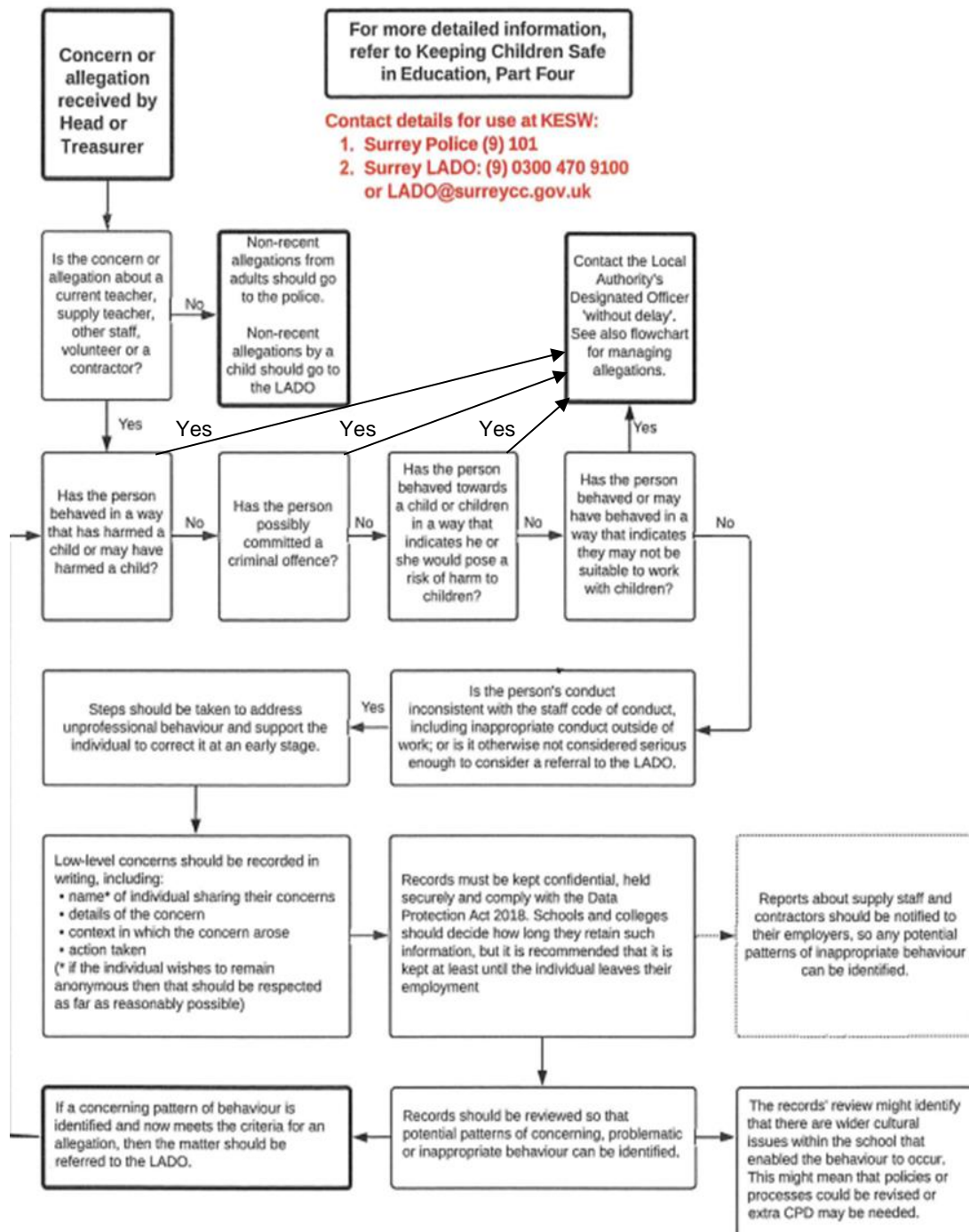
Appendix 5 – Online Safety

121.   Online safety is considered as part of our whole school safeguarding approach and wider staff training and curriculum planning. Online safety is a running and interrelated theme which is reflected in our policies and procedures. Children are taught about safeguarding, including online safety. A personalised or contextualised approach is taken for more vulnerable children, victims of abuse and some children with SEND.

122.   The School acknowledges the fact many children have unlimited and unrestricted access to the internet via mobile phone networks. The school will follow its policy on the use of mobile and smart technology in school to safeguard children and will follow child-on-child abuse procedures if mobile phones are used by a child whilst in school to sexually harass their peers via their mobile and smart technology, share indecent images: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content. The "Antibullying Policy" and the "E-Safety and ICT Acceptable Use Policy" contain further details about this.

123.   The school recognises that online risks arise when a child:

●   engages with and/or is exposed to potentially harmful CONTENT;
●   experiences and/or is targeted by potentially harmful CONTACT;
●   witnesses, participates in and/or is a victim of potentially harmful CONDUCT;
●   is party to and/or exploited by a potentially harmful embedded marketing content and data misuse