

## **SAFEGUARDING AND CHILD PROTECTION POLICY**

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The Safeguarding and Child Protection Policy is in accordance with the most recent version of the ISSRs and locally agreed inter-agency procedures (Milton Keynes Safeguarding Children Board) for dealing with any concerns about a child.

This policy is applicable to all staff and parents of children within the school, including the Early Years Foundation Stage.

This document is available in written format upon request and a copy can also be located on the school's website.

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### 1 INTRODUCTION

The safety and wellbeing of all children at the school, including those in the Early Years Foundation Stage, is the school's highest priority. The school aims to know every child as an individual and to provide them with a secure and caring environment, so that they can develop and learn in safety. All those who come into contact with children and families in their everyday work, including practitioners who do not have a specific role in relation to safeguarding children, have a duty to safeguard and promote the welfare of children.

All members of staff have a duty to act in the child's best interests at all times so that every child feels positive about themselves as an individual and is able to reach their full potential. The school expects respect, good manners and fair play to be shown by everyone. All children should care for and support each other.

All staff share the responsibility to ensure that the school provides a safe, caring, positive and stimulating environment that promotes the social, physical and moral development of the individual child.

The school fosters a listening environment where children are encouraged to speak to any staff member about any concerns they may have and where staff understand the importance of listening to the child and placing the child's need first.

Parents and guardians have an important role to play in supporting the school. The school encourages parents and guardians to raise any issues or worries that they may have with the school.

The school will always respond immediately if there is a concern and/or allegation of child abuse/neglect or where a child is identified as being at risk. Providing early help is vital to promoting the welfare of the child. Staff are trained to be alert to any potential concerns and risks to a child's welfare. All staff are trained to immediately inform one of the Designated Safeguarding Leads, if they have any concerns about a child's welfare.

**Safeguarding** is defined as protecting children from maltreatment, preventing impairment of children's health or development, ensuring that children are growing up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best possible outcomes. (Working Together to Safeguard Children 2018).

**Child protection** is a part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering or are likely to suffer significant harm (Working Together to Safeguard Children 2018).

The school's procedures for safeguarding children have regard and adhere to the following statutory and non-statutory guidance:

- Counselling in Schools: A Blueprint for the future (February 2016)
- Keeping Children Safe in Education (KCSIE, September 2018).
- Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers (July 2018).
- Levels of Need when Working with Children, Young People and their Families in Milton Keynes (MKSCB, July 2016).
- Mental Health and Behaviour in Schools (March 2016).

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- Prevent Duty Guidance for England and Wales (July 2015).
- Safer Recruitment Guidance (MKSCB, December 2014).
- The Education (Independent Schools Standards) Regulations (2014).
- The Prevent Duty: Departmental Advice for Schools and Childminders (June 2015).
- The Statutory Framework for the Early Years Foundation Stage (2017).
- The Use of Social Media for On-line Radicalisation (July 2015).
- Working Together to Safeguard Children (July 2018).
- What to do if you're worried a child is being abused (March 2015).

The school will continually review this policy following updates and guidance from the Independent Schools Inspectorate (ISI) and any statutory and local authority guidance.

### **2 THE AIMS OF THIS POLICY**

- To ensure that the Proprietor, Head and Governors fulfil their obligations in respect of the governance of safeguarding and child protection and Prevent awareness, including the conduct of an annual review of safeguarding and the effectiveness of the implementation of this policy.
- To raise awareness in all staff of their responsibilities to safeguard children, including the requirement to prevent children from being radicalised or drawn into extremism and ensure that staff are able to identify and report possible cases of abuse/neglect and children at risk.
- To provide a means of monitoring children known or thought to be at risk of harm, including the risk of radicalisation and ensure that the school contributes to assessments of need and support plans for those children.
- To acknowledge the need for effective and appropriate communication between all members of staff in relation to safeguarding children.
- To develop structured procedures within the school which all members of the school will follow.
- To develop effective working relationships with all other agencies involved in safeguarding children.
- To provide an environment in which children feel safe, secure, valued and respected and to support the children in ways that will foster confidence, resilience and ensure they know how to approach adults if they are in difficulties.
- To ensure that all adults within the school, who have access to children, have been checked as to their suitability to work in the school.

### **3 PROCEDURES**

- All members of staff, part-time staff and volunteers are trained to identify and know how to respond to a child who discloses abuse or neglect or who is possibly at risk of radicalisation and knows how to follow the procedures when sharing a concern of possible abuse/neglect, the disclosure of abuse/neglect or the risk of radicalisation.
- All parents/carers are made aware of the school's responsibilities and safeguarding procedures through publication of the school's Safeguarding and Child Protection Policy.
- The school's Safer Recruitment Policy and related procedures include all checks on staff suitability including Barred List, Disclosure and Barring Service Enhanced Disclosures and Prohibition Order checks, as recommended by KCSIE (September 2018) and by the MKSCB and in accordance with current legislation.

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- All new staff will be given a copy of the following, as part of their induction into the school:
  - The Safeguarding and Child Protection Policy.
  - The names of the school's Designated Safeguarding Leads.
  - The school's Code of Conduct for Staff.
  - Keeping Children Safe in Education Part 1 and Annex A (September 2018).
  - The school's Whistle Blowing Policy.

### 4 RESPONSIBILITIES

The school understands its responsibilities to safeguard children requires that all staff share any concerns they may have about children.

#### 4.1 The Proprietor, Head and Governing Body

The Proprietor, Head and Governing Body understand and fulfil their safeguarding and Prevent responsibilities to achieve the following:

- Comply with their duties under legislation and to ensure that there is a robust Safeguarding and Child Protection Policy in place and that the policy is reviewed annually.
- Ensure that the key activities of the DSL role are included in the Job Descriptions of those who are DSLs.
- Ensure that DSLs have sufficient time, funding, supervision and support to fulfil their safeguarding responsibilities.
- Ensure there is an effective staff behaviour policy in place.
- Record the efficiency with which any related duties have been discharged and ensure any deficiencies in the policy or practices are immediately rectified.
- Monitor the effectiveness of the implementation and compliance with the policy.
- Ensure that all staff are aware of the school's Safeguarding and Child Protection Policy and the procedures and know how to recognise and refer any concerns.
- Ensure that all staff knowledge and training is up-to-date for safeguarding and child protection and Prevent awareness training.
- Ensure that the Chair of Governors, as the lead Safeguarding Governor, liaises with the LADO and partner agencies in the event of allegations of abuse made against the Head.
- Ensure that DSLs and the Safeguarding Governor contribute to inter-agency working as and when required to do so.
- Ensure that all staff know that if there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately.
- Ensure that all staff know that anybody can make a referral.
- Ensure that there are safe and effective recruitment policies in place, which adhere to KCSIE statutory guidelines (September 2018).
- Ensure that all records pertaining to safeguarding and child protection are kept securely.
- Ensure that the school operates appropriate filtering and monitoring systems to safeguard children online.

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### 4.2 Designated Safeguarding Leads

- The main Designated Safeguarding Lead (DSL) are the Head and Matron who understand the role as per Part 2 of KCSIE (September 2018) and understands the role to liaise with the local authority and work with other agencies in line with the Working Together to Safeguard Children (July 2018).
- The Designated Safeguarding Leads are named in Appendix 1.
- DSLs will undergo child protection training every two years, in line with advice from the Milton Keynes Safeguarding Children Board (MKSCB) and this will incorporate Prevent awareness training.
- The school recognises the important role that the DSLs have to play and will support them with the training necessary to carry out their roles effectively. In addition to their formal training, the knowledge and skills of the DSLs will be updated regularly and at least annually. This can be in the form of bulletins from the MKSCB, on the publication of new DfE guidance and other safeguarding updates and communications via meetings.
- The main DSL/other DSL will refer a child to the MKSCB if there are concerns about a child's welfare and/or possible abuse or neglect.
- Allegations of abuse by a member of staff will be referred to the Local Authority Designated Officer (LADO). A written record of the referral will be emailed to the LADO as soon as possible within the school day.
- An allegation of abuse by someone outside of the school setting will be referred by the main DSL to the MKSCB.
- The main DSL will ensure that detailed and accurate written records of concerns about a child are kept even if there is no need to make an immediate referral.

***Safeguarding is everyone's responsibility and anyone can make a referral to the MKSCB.***

***The school will not tolerate any form of abuse.***

### 5 PROCEDURES FOR A CHILD REPORTING ABUSE

Children who have a problem may speak to someone whom they trust. It is important that the member of staff to whom the child wishes to speak about a concern, does not promise confidentiality.

However, if there is a concern that the child is suffering or at risk from suffering significant harm, regardless of the fact they want to maintain confidentiality, the matter must be referred to main DSL who will in turn, refer the matter to the MKSCB. Parental consent is not required to make a referral when there are grounds to believe the child may be at risk of significant harm.

- If the child is only prepared to speak if absolute confidentiality is guaranteed, the member of staff should terminate the conversation at that point. It should be explained to the child that confidentiality cannot be promised. Explain to the child that the member of staff is obliged to inform the DSL.
- The adult, to whom the child has spoken, should immediately provide the DSL with a written account of what has transpired.

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- If a child decides to speak to a member of staff about the fact that either he/she, or a child known to them, is being bullied, harassed, abused or neglected, the member of staff should listen to the child's account and not ask leading or detailed questions. Allow the child to tell his or her own story.

**All staff to note:** It is important to understand that subsequent enquiries could be prejudiced by asking detailed and/or leading questions in school. Defendants have been acquitted where leading questioning or inappropriate investigations have been proven.

- The DSL will refer the concern immediately to MKSCB which will decide how the matter will be investigated or assessed.
- The DSL will liaise with and receive guidance from the MKSCB about how best to support and monitor the child concerned through any process of investigation and about any liaison with parents, carers or other agencies involved.
- Explain to the child that only those who have a professional 'need to know' will be told and, if appropriate, measures will be set up to protect the child from retaliation and further abuse.
- Reassure the child that he or she was right to tell, and that he/she is not to blame for having being bullied or abused.
- The school will collaborate with MKSCB in any investigations, assessments or planning processes.

Where there are evident signs of physical injury the MKSCB must be immediately notified. In such a case, parental consent is not required to make a referral.

### 6 ALLEGATIONS OF ABUSE AGAINST TEACHERS AND STAFF

The school makes reference to KCSIE Part 4 (September 2018) and the requirements of the most recent version of the Independent Schools Standards Regulations.

The school understands that a child may make an allegation against any member of staff, including the Head, Matron, DSLs, teaching and non-teaching staff, part-time, temporary, voluntary, supply staff and visiting staff such as musicians, religious ministers, sports coaches and Governors. If an allegation is made, then the member of staff receiving the allegation must inform the Head or Matron immediately. The Head or Matron will contact the LADO within one working day to discuss the allegation, consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. All discussions will be recorded in writing and the school will follow the procedures agreed with the LADO.

The Head will immediately inform the Proprietor.

In the absence of the Head or Matron, the member of staff must inform the Chair of Governors. Contact details for the LADO and the Chair of Governors are contained in Appendix 1.

If the allegation made is concerned with the Proprietor or Head or one of the DSLs, then the member of staff receiving the allegation must inform the Chair of Governors, without informing the Head. The Chair of Governors should immediately refer to the LADO.

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When an allegation is made, the school will not undertake its own investigations of allegations without prior consultation with the LADO or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases discussions with the LADO can be held informally and without naming the school or individual.

The school will consider whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place. The school will act in accordance with plans derived through discussions with the LADO and/or the Police when making a decision about suspension.

The school will make every effort to maintain confidentiality and guard against unwanted publicity. These restrictions apply up to the point where the accused person is charged with an offence, or the Department for Education (DfE) and /or the Teacher Regulation Agency (TRA) publish information about an investigation or decision in a disciplinary case.

The school will promptly report to the Disclosure and Barring Service (DBS) any person leaving the school (whether employed, contracted, a volunteer or student) whose services are no longer used for regulated activity or who has been dismissed (or would have been, had the person not left the setting first) because he or she is considered unsuitable to work with children (that is, they have caused harm or posed a risk of harm to a child). Reports will include as much evidence about the circumstances of the case as possible. The school understands that failure to make a report constitutes an offence. Compromise or settlement agreements cannot be used to either prevent a referral being made to the DBS.

The Proprietor understands the legal duty to respond to requests from the DBS for information the school already holds.

The school will consider making a referral to the Teacher Regulation Agency (TRA) for any teacher that has been dismissed (or would have been dismissed had he/she not resigned) and a Prohibition Order may be appropriate. The reasons such an order would be considered are 'unacceptable professional conduct, 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'. Further guidance is published on the TRA website (Teacher Misconduct: The Prohibition of Teachers, April 2018).

### **7 PEER-ON-PEER ABUSE AND SEXUAL HARASSMENT**

This procedure is for dealing with abuse by one or more children against another child. All peer on peer abuse is unacceptable and will not be tolerated. Peer on peer abuse can take many forms, for example, making abusive comments, which should not be passed off as 'banter' or 'having a laugh' or 'part of growing up', engaging in abusive interactions, making abusive comments and/or engaging in activity of a sexualised nature, physical abuse, initiation ceremonies or rituals or hazing-type violence and sexting. Sexual violence and sexual harassment can overlap and can take place online. When there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm' then any such abuse will be referred to the MKSCB as a child protection concern.

Sexting, for the purposes of this policy, is defined as the generation and/or sharing of images or videos by children under the age of 18 where such images or videos are shared with another child or children or adult via a mobile phone, tablet, laptop, computer or website. Sexting is classed as illegal.

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The school recognises the gendered nature of abuse i.e. that girls are more likely to be victims and boys more likely to be perpetrators.

### 7.1 Prevention of peer-on-peer abuse

The school recognises that peer-on-peer abuse can occur even with the most robust policies and support processes in place. Therefore, the school encourages an environment where children can feel safe to share information about anything which worries them or causes them to feel upset. Appropriate behaviour is regularly reinforced through assemblies and form time discussions.

### 7.2 Procedures for dealing with peer-on-peer abuse

Staff, to whom the concerns are reported, should listen to child's concerns and offer immediate support. Staff will not dismiss anything report to them which appears to be 'banter' or 'just growing up'. Staff should refer the child immediately to the main DSL, or, in her absence, another DSL.

- The DSL will reassure the child that they have done nothing wrong and that it was the right thing to report. If appropriate, immediate medical treatment/advice should be sought.
- If the concerns relate to sexting, then staff must not share or copy the images with other staff members.

The DSL will listen to the child and make a written record of the incident, identify evidence and seek witnesses. The DSL will not guarantee confidentiality of information and will inform the child that the school will be speaking to inter-agency bodies and the alleged abuser(s).

- The DSL will inform parents.
- The school will report to MKSCB within 24 hours of a disclosure or suspicion of abuse.

In the event of a disclosure about child on child abuse, the school will treat all children involved, whether perpetrator or victim, as being 'at risk' and the school will provide support to all the children.

Where there has been a report of sexual violence, the DSL should make an immediate risk assessment which should be recorded in writing and which considers:

- The victim and their need for protection and support.
- The alleged perpetrator, their proximity to the victim and if steps need to be taken to keep them apart, if sharing a class or school transport, for example.
- All other children, where there is a need to protect them.

The immediate consideration will be what support to provide to the child, the alleged perpetrator and other children involved/impacted. The wishes of the victim, the nature of the allegations and the protection of all children in the school will be of paramount importance when considering immediate actions to take. The DSL will follow guidance provided by the MKSCB.

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Each case reported will be considered on an individual basis. The main DSL, in conjunction with any guidance provided by the MKSCB, will consider the following options:

1. To manage the case of sexual harassment internally, if the children involved are not in need of early help or statutory intervention and that it would be appropriate to manage the incident internally.
2. To consider if multi-agency early help is the appropriate course of action.
3. If the child has been harmed, or is at risk of harm, or is in immediate danger, the DSL should make a referral to MKSCB. Such referrals will be made immediately.
4. To report to the Police. If this option is chosen, then a parallel report will be made to the MKSCB. The school will inform parents unless, to do so, would put the child at additional risk.

The school will provide appropriate on-going support to the children involved, where appropriate and in conjunction with multi-agency professionals.

### **8 ALLEGATIONS OF ABUSE AGAINST PERSONS OUTSIDE OF THE SCHOOL**

In the case of allegations of abuse by persons outside of the school where a child's welfare, possible abuse or neglect is of concern, then the member of staff will refer the matter to the Head or other DSL if the Head is not available. The DSL will then liaise with the MKSCB in the first instance. A written record of the referral will be e-mailed to the MKSCB as soon as possible within the same school day. The main DSL will be required to keep detailed and accurate written records of all concerns about a child, even if there is no need to make an immediate referral.

### **9 GUIDANCE IF INAPPROPRIATE BEHAVIOUR IS NOTICED BY ANOTHER MEMBER OF STAFF**

If a member of staff has concerns about the behaviour of another member of staff towards a child, he/she should report the concerns immediately to the Head or Matron. Any concerns will be thoroughly investigated. If there is evidence of criminal activity, the Police will always be informed. Wherever possible and subject to the rights of the child, the member of staff will be informed of the outcome of the investigation.

All staff can report a genuine concern with impunity.

### **10 INFORMATION SHARING**

Sharing information is essential for effective safeguarding and promoting the welfare of children. All staff are reminded that the General Data Protection Regulation (GDPR) introduced in May 2018 and the Data Protection Act 2018 are not barriers to justified information sharing to protect a child from harm or the risk of harm.

The safeguarding of children at risk is a condition that allows safeguarding practitioners to share information legally without consent, if, to gain consent, could place a child at risk.

Relevant personal information can be shared lawfully if it is to keep a child safe from neglect or physical, emotional or mental harm, or if it is protecting their physical, mental or emotional well-being.

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### 11 PREVENTION

The school recognises that it plays a significant role in preventing harm to children in the following ways:

- Across the curriculum, opportunities are provided that equip children with the skills they need to stay safe from harm and to know to whom they should turn to for help.
- Children will be taught about safeguarding and online safety, through the curriculum. Particular attention will be paid to the school's practices to help children to adjust their behaviours in order to build resilience and reduce risks, including those of radicalisation. They will also be taught about the importance of telling a teacher/other member of staff if they come across something online which makes them uncomfortable.
- Ensure that all children know there is an adult in the school whom they can approach if they are worried or in difficulty.
- Establish and maintain an ethos, which is understood by all staff, which enables children to feel secure and encourages them to talk knowing that they will be listened to.
- The school has an appropriate policy in place when dealing with abuse by one or more children against another child when there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm' including that any such abuse will be referred to the local authority as a child protection concern. The school will ensure that in the event of any disclosures about children on children abuse that all children involved, whether perpetrator or victim, are treated as being 'at risk'.

Any school decision to seek support for a child in need, or about whom there are concerns (including concerns relating to radicalisation) would normally be taken in consultation with parents. Parent consent would not be required where there are reasonable grounds to believe that a child is a risk of significant harm.

#### 11.1 Anti-Bullying

Bullying, harassment, victimisation and discrimination will not be tolerated. The school will treat all children and parents fairly and with consideration and we expect them to reciprocate towards each other, the staff and the school. Any kind of bullying is unacceptable.

- *Please refer to the separate document: Anti-Bullying Policy.*

#### 11.2 Children Missing Education

It is recognised that one of the signs of children being at risk of or being harmed is when the child is missing from school without explanation, particularly on a regular basis. The school works with parents to ensure that it is able to account for every child who is absent from school. Parents are encouraged to telephone the school on the first and every successive day of illness.

When a child is not in school without an explanation, then the school will attempt to contact parents for an explanation.

#### 11.3 Child Sexual Exploitation

This is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young children are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation can include both contact and non-

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contact sexual activity and can also occur through the use of technology. A significant number of

children who are victims of sexual exploitation go missing from home, care and education at some point.

As part of their safeguarding training, staff are taught to recognise possible signs of sexual abuse. If a member of staff suspects that a child may be at risk or suffering from child sexual abuse, he/she must immediately report this to the main DSL who will liaise with the MKSCB and follow its procedures for notification of child sexual exploitation.

### 11.4 Female Genital Mutilation (FGM)

When a member of staff discovers that an act of FGM appears to have been carried out, he/she must immediately report this to the main DSL. It is mandatory for the main DSL to inform the Police. MKSCB will be involved as appropriate.

### 11.5 Online Safety

The school ensures that robust monitoring and filtering systems are in place to safeguard children online. This is to protect children from:

- Being exposed to inappropriate, harmful, extremist or illegal material.
- Being subjected to harmful online interactions with other users.
- Potentially harmful online behaviour that may expose them to harm.

Children are regularly taught, in an age-appropriate way, about how to keep themselves safe online, how to recognise inappropriate material and are taught about the importance of raising any concerns they may have to staff.

No child is allowed to use internet technology in school. Access to internet technology is only permitted during lesson-time and is always supervised by a member of staff.

Children are not allowed to bring mobile phones into school.

### 11.6 One-to-One Teaching

When children receive one-to-one specialist teaching, for example, music lessons or dyslexia coaching, the child will be collected from their class with the permission of the class teacher.

The child and teacher will remain within visual and auditory contact of other staff at all times for the duration of the specialist teaching.

### 11.7 Prevent Awareness

The school will adhere to the obligations set out in The Prevent Duty (July 2015). Protecting children from the risks of radicalisation is part of the school's wider safeguarding duties. Radicalisation refers to the process by which a person comes to support terrorism and other forms of extremism. The school will build children's resilience to radicalisation by promoting fundamental British Values throughout the curriculum and through form time and assemblies.

It is essential that staff are able to identify children who may be vulnerable to radicalisation and know what to do when they are identified. Staff should be alert to changes in behaviour

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in children that may indicate that the child might be in need of help or protection. Where a staff member identifies a concern, then the staff member must consult with the main DSL.

When there are significant concerns about a child, the DSL may seek advice and/or make a referral to the most appropriate body, either Channel or MKSCB. Further contacts are provided in Appendix 1.

The Prevent Duty requires the school to ensure that any visiting speakers are suitable and appropriately supervised. A member of staff will always be present when any visiting speaker addresses children. It is the responsibility of the member of staff inviting the visitor, to ensure that references are sought prior to the visit and that the member of staff is assured as to the suitability of the speaker to address children.

### **11.8 Taking Photographs of Children**

The school will use photographs as a way to share and celebrate children's achievements in school. Parents will themselves often enjoy seeing their children's photographs in school. The school wishes to ensure that everyone can continue to enjoy these activities safely. Only school cameras are to be used to take photographs of approved activities in school. Mobile phones are not to be used. This applies to the whole school, including EYFS.

- *Please refer to the separate document: Policy on Taking, Storing and Using Images of Children.*

### **11.9 Use of Mobile Phones in School**

Mobile phones provide staff with important contact with their families and, therefore, it is accepted that staff will have the devices in school. However, they must only be used in the staff room and restricted office areas.

- *Please refer to the separate document: Mobile Phone Policy.*

Parents are requested not to use their mobile phones in school.

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### 12 SUPPORTING CHILDREN

Staff are trained to be alert to any signs and symptoms which could indicate that a child needs early help. Early help means providing support as soon as a problem emerges at any point in a child's life (KCSIE, September 2018).

The school recognises that disabled children and children with special educational needs may face additional safeguarding challenges. Therefore, the school will review and undertake regular monitoring of these children.

Children who have suffered or are likely to suffer significant harm will be referred immediately to the MKSCB and the school will follow MKSCB procedures. Where decisions to seek support for a child in need would normally be taken in consultation with parents, no consent is required for a referral when there are reasonable grounds to believe that a child may be at risk of significant harm.

Where a child needs additional support from one or more agencies, the school will invoke inter-agency assessment using local inter-agency procedures:

- The Common Assessment Framework (CAF) is designed to enable early and effective assessment of children who might need additional support.
- The Multi Agency Referral Form (MARF) is designed to enable a non-urgent referral to be made to the Multi Agency Referral Hub (MASH).

Where Child Protection or Child in Need procedures are invoked, the school will follow inter-agency practices and recommendations from the MKSCB with regard to specific support to be put in place by the school for the child.

Where a child is identified as being at risk of radicalisation, the main DSL will identify the most appropriate source of support for the child and the family. This could be via Channel or MKSCB. The relevant contacts are contained in Appendix 1.

### 13 SUPPORTING STAFF

Staff working in the school who have become involved with a child who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting. The school will support such staff by providing an opportunity to talk through their anxieties with a DSL and to seek further support.

Staff are also made aware of guidance to ensure that their behaviour and actions do not place children or themselves at risk of harm or of allegations of harm to a child (for example, in one-to-one tuition, sports coaching, conveying a child by car, engaging in inappropriate electronic communication with a child, and so on).

### 14 CONFIDENTIALITY

The school recognises that all matters regarding the safeguarding of children are confidential.

- The Head, Matron and/or DSL will disclose personal information about a child to other members of staff on a need to know basis only.
- All staff have a professional responsibility to share information with other agencies in order to safeguard children, following MKSCB inter-agency protocols for communication.

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- All staff must not promise a child to keep any secrets that may compromise the child's safety or well-being or that of another child.
- Staff must not promise a child confidentiality when a child raises a safeguarding concern with them.
- The school will always undertake to share its intention to refer a child to the MKSCB with their parent's/carers permission, unless to do so, could put the child at greater risk of harm, or impede a criminal investigation.
- A member of staff who reports another member of staff for inappropriate behaviour is entitled to have his/her name protected from being disclosed by the Head or Matron to the alleged perpetrator, without his/her prior approval. However, it has to be recognised that his/her evidence may be required by the Police to be used in any criminal proceedings.

### 15 DESIGNATED SAFEGUARDING LEADS

The Matron is the main Designated Safeguarding Lead (DSL) and has overall responsibility for the school's safeguarding and Prevent responsibilities and undergoes refresher training every two years.

The Matron's responsibility is to maintain an overview of safeguarding and Prevent practices within the school, to open channels of communication with local agencies and to monitor the effectiveness of policies and procedures in practice.

Safeguarding concerns for children should be referred, in the first instance, to the Matron, as the main DSL. If the Matron is away from the school site, during normal school hours, safeguarding concerns should be referred to the school on 01908 678403 specifically to Mrs Amanda Bolt (Deputy Matron), Miss Samantha Johnson (Deputy Matron), Mrs Lena Murphy (Registrar) or Miss Emma Pettman (Deputy Matron).

The Designated Safeguarding Leads are named in Appendix 1.

Access to the school's records on Child Protection is restricted to the Head, Matron and other DSL's.

### 16 EARLY YEARS FOUNDATION STAGE

Ofsted will be informed of any allegations of serious harm or abuse by any person working or looking after children on the school premises (whether that allegation relates to harm or abuse committed on the school premises or elsewhere), or any other abuse which is alleged to have taken place on the premises and of the action taken in respect of these allegations.

These notifications will be made as soon as is reasonably practicable, but at least within 14 days of the allegations being made. The school understands that as a registered provider who, without reasonable excuse, fails to comply with this requirement, commits an offence.

The school has very specific guidelines on the use of mobile phones in school. Staff are not permitted to take photographs of EYFS children with their mobile phones. Only school cameras may be used for that purpose.

- *Please refer to the separate document: Mobile Phone Policy.*
- *Please refer to the separate document: Policy on Taking, Storing and Using Images of Children.*

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Detailed safeguarding training, based on the requirements of the EYFS Statutory Framework, is provided to all staff, including staff working in the EYFS. See the Staff Training section of this policy.

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### 17 SAFER RECRUITMENT

The school will ensure all appropriate child protection checks and procedures are applied to any member of staff employed by the school before he/she begins their employment. This will include any staff employed by another organisation and working with the children in school or on any other site.

All members of staff will be supervised at all times until all Disclosure and Barring Service (DBS) checks have been completed.

All new teaching staff will be Prohibition Order checked.

All new teaching staff will be EEA checked from 18 January 2016.

All staff appointed to a management position from 12 August 2015 will be subject to a Prohibition from Management check. This applies to internal appointments as well as external appointments.

All necessary staff details and recruitment checks will be entered onto the school's Single Central Record (SCR) and will be reviewed regularly by the school's senior management team.

- *Please refer to the separate document: Safer Recruitment Policy.*

### 18 TRAINING

#### 18.1 Induction Training

Every new member of staff receives induction training on their responsibilities to be alert to the signs of abuse and bullying. They will be informed of the names of the DSLs to whom any safeguarding concerns should be referred. They will also receive induction training on the procedures for recording and referring any safeguarding concerns to the main DSL and/or the other DSLs.

During induction, new employees will be given copies of the following:

- The Safeguarding and Child Protection Policy.
- The names of the school's Designated Safeguarding Leads.
- The Code of Conduct for Staff.
- The Whistle Blowing Policy.
- The Behaviour, Sanctions and Rewards Policy.
- Keeping Children Safe in Education Part 1 and Annex A.
- *Please refer to the separate document: Code of Conduct for Staff.*
- *Please refer to the separate document: Whistle Blowing Policy.*

#### 18.2 Training for the Head and DSLs

The Head, Matron and the DSL's attend refresher training in safeguarding and child protection and Prevent awareness training every two years (as determined by the MKSCB), covering the following areas:

- The assessment process for providing early help and intervention.
- The MKSCB practices for child protection case conferences and child protection review conferences and how to contribute effectively to these.

## SAFEGUARDING AND CHILD PROTECTION POLICY

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- Inter-agency working practices.
- How to support children in need.
- Online safety.
- Identifying children at risk of radicalisation.
- Record keeping protocols.
- Continuing to ensure that the school culture is one based on listening to children and taking account of their wishes and feelings.

As the local authority develops its services to support the Prevent Duty, it is anticipated that DSLs will undergo higher levels of training on how to be able to assess the risk of children being drawn into terrorism, including being drawn into support for extremist views.

All DSL's are given copies of Annex B of the KCSIE to support their understanding of their responsibilities as the Designated Safeguarding Lead.

The Head and Matron will ensure that the DSL's are given sufficient time, funding and supervision to fulfil their safeguarding responsibilities effectively.

### 18.3 Staff Training

All members of staff receive safeguarding training and Prevent awareness training annually in order to:

- Develop their understanding of the Safeguarding and Child Protection Policy.
- Recognise the differences between a safeguarding concern and a child who is at risk of immediate harm.
- Recognise the signs and symptoms of abuse at the earliest opportunity. This includes:
  - Significant changes in a child's behaviour.
  - Signs of deterioration in a child's well-being.
  - Unexplained bruising, marks or other sign of possible abuse or neglect.
  - Parent comments which may give cause for concern.
  - Any reasons to suspect abuse/neglect outside the school setting, for example, the child's home.
  - Understanding the particular vulnerabilities of children with disabilities and/or SEN who are at risk of greater harm.
  - Inappropriate behaviour displayed by staff or other persons working with children, for example, inappropriate sexual comments, excessive one-to-one attention beyond that which would be expected in the role or sharing of inappropriate images.
- Identify children who may be at risk of being exposed to extremism, how to challenge extremist ideas and how to refer children for further help.

Training records are maintained which identifies the Basic Safeguarding Training and Prevent awareness training provided to staff.

Training is given to part-time and any voluntary staff.

Each time KCSIE is updated, staff will receive an update, along with Annex A.

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The school will follow advice from the MKSCB with regard to determining the most appropriate level and focus for safeguarding training for staff.

Staff are also made aware of guidance to ensure that their behaviour and actions do not place children or themselves at risk of harm or of allegations of harm to a child (for example, in one-to-one tuition, sports coaching, conveying a child by car, engaging in inappropriate electronic communication with a child, and so on).

- *Please refer to the separate document: Code of Conduct for Staff.*

The school considers the above training schedule to be of adequate frequency. However, the school will consult regularly with MKSCB to determine the most appropriate schedule for training and will review annually, the level and focus of training required.

The Head and or Matron will ensure that staff have the skills, knowledge and understanding necessary to keep safe children who are looked after by a local authority. This will include ensuring the appropriate staff have up to date assessment information from the relevant local authority, the most recent care plan and contact arrangements with parents, and delegated authority to carers, and information available to the DSLs.

The school will ensure that all staff working with children will have regular reviews of their own practice and have opportunities to discuss any concerns they may have about safeguarding matters. This will include the personal and professional duty to report welfare and safeguarding concerns to the Head, Matron and/or DSL's in the school, or, in their absence, directly to MKSCB.

The school will ensure that all staff receive copies of the school's Safeguarding and Child Protection Policy when updated.

### 19 REVIEW OF POLICIES AND PROCEDURES

The Proprietor is responsible for ensuring that the Safeguarding and Child Protection Policy and procedures are reviewed annually. The review will ensure that the policy is up-to-date with any guidance and advice provided by the Independent Schools Standards Regulations, statutory regulations and MKSCB policy and procedures and will consider the efficiency with which the child protection duties have been discharged. The review will include the contribution to inter-agency working through effective communication and good cooperation with local agencies in line with 'Working Together to Safeguard Children' (July 2018). The review will be carried out in conjunction with the nominated Safeguarding Governor.

The Proprietor understands that responsibility for the annual review cannot be delegated. However, the Proprietor may make appropriate arrangements for the review to be carried out by suitable others. The review will then be reported to the Proprietor, the Head and Governors.

The implementation of these policy provisions will be checked through discussion with the Proprietor, the Head, Matron and DSL's and by scrutiny of the minutes of Governor meetings and available evidence underpinning the review. The review will also take into account, but is not limited to:

- Any written report or information presented to Governors to support the review.
- Training records.

## SAFEGUARDING AND CHILD PROTECTION POLICY

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- Referral information in respect of requests for help and support for individual children.
- Issues and themes which may have emerged in school and how these have been handled.
- The contribution the school is making to multi-agency working in individual cases.
- Local discussions on safeguarding matters.

Information will be sufficiently detailed to demonstrate both breadth and depth of the review.

The Proprietor and Safeguarding Governor are responsible for overseeing the annual review and implementation of Safeguarding and Child Protection matters. They will carry out regular monitoring checks on safeguarding procedures and known practice amongst different cross sections of staff within the school to ensure that staff know who to go to in the case of suspected abuse and what they might do in terms of communicating with a child in this context. Each time the Safeguarding Governor visits the school for this purpose, the findings will be recorded in written format and retained in the Safeguarding and Child Protection file.

The Proprietor and Safeguarding Governor are also responsible for:

- Approving amendments to safeguarding and child protection procedures in the light of changing regulations or recommended best practice.
- Ensuring that any identified deficiencies or weaknesses in safeguarding and child protection procedures are immediately remedied.
- Ensuring the school works with the LADO to determine whether there are any improvements to be made to the school's procedures or practice following a substantiated allegation against a member of staff.
- Ensuring the school's commitment to report promptly to the DBS any person (whether employed, contracted, a volunteer or student) whose services are no longer used because he/she is considered unsuitable to work with children. Ceasing to use a person's services includes: dismissal; non-renewal of a fixed-term contract; no longer engaging or refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training or volunteering.

The Proprietor and Safeguarding Governor understand that:

- Failure to make a report constitutes an offence and as a consequence could lead to the school being removed from the register of independent schools.
- 'Compromise agreements' cannot apply in this connection.
- The legal duty to respond to requests from the DBS for information that the school already holds and that the school does not have to find it from other sources.

The school will follow appropriate regulations for all peripatetic teaching staff and shall ensure the necessary safeguarding checks, as detailed in the most recent Independent School Standards Regulations are actioned.

## **SAFEGUARDING AND CHILD PROTECTION POLICY**

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**The Safeguarding and Child Protection Policy was reviewed on 11 January 2019 and will be reviewed on or before 31 August 2019.**

## SAFEGUARDING AND CHILD PROTECTION POLICY

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### APPENDIX 1 CONTACTS

#### SCHOOL CONTACTS

- Mrs Hilary Pauley, Proprietor, Broughton Manor Preparatory School, Newport Road, Broughton, Milton Keynes, MK10 9AA.
- Chair of Governors and nominated Safeguarding and Prevent Governor: Mr David Pye, c/o Broughton Manor Preparatory School, Newport Road, Broughton, Milton Keynes, MK10 9AA. Any correspondence should be marked as Strictly Confidential. Tel: 01908 665234.
- Designated Safeguarding Leads: Mrs Chantelle McLaughlan (Matron), Mrs Amanda Bolt (Deputy Matron), Miss Samantha Johnson (Deputy Matron), Mrs Lena Murphy (Registrar), Miss Emma Pettman (Deputy Matron).
- School telephone number: 01908 678403.

#### INTER-AGENCY CONTACTS

Milton Keynes Council	01908 691691
Emergency Social Work Team (out of office hours)	01908 265545 <a href="mailto:children@milton-keynes.gov.uk">children@milton-keynes.gov.uk</a>
LADO, Jo Clifford	01908 254300 <a href="mailto:jo.clifford@milton-keynes.gov.uk">jo.clifford@milton-keynes.gov.uk</a>

If the LADO is not available, refer to Multi Agency Safeguarding Hub on 01908 253169.

For further guidance please see the Milton Keynes Safeguarding Children Board's website:  
[www.mkscb.org](http://www.mkscb.org)

#### Forced Marriage Unit

020 7008 0151  
[fmf@fco.gov.uk](mailto:fmf@fco.gov.uk)

#### OTHER CONTACTS

Ofsted, <sup>SEP</sup> 1 Piccadilly Gate, <sup>SEP</sup> 1 Store Street, <sup>SEP</sup> 1 Manchester, <sup>SEP</sup> 1 M1 2WD or <a href="mailto:enquiries@ofsted.gov.uk">enquiries@ofsted.gov.uk</a>	
Ofsted	0300 123 1231
NSPCC	0808 800 5000
NSPCC Whistleblowing Helpline	0800 028 0285
ChildLine	0800 11 11
Crimestoppers	0800 555 111
CEOP (Child Exploitation and Online Protection)	0870 000 3344
Child Exploitation and Online Protection Centre, 33 Vauxhall Bridge Road, London, SW1V 2W	
CEOP's Thinkuknow website	<a href="http://www.thinkuknow.co.uk">www.thinkuknow.co.uk</a>
The UK Safer Internet Centre	<a href="http://www.saferinternet.org.uk">www.saferinternet.org.uk</a>

Disclosure and Barring Service (DBS), PO Box 181, Darlington, DL1 9FA. 01325 953795

#### The Prevent Duty

DfE Non-emergency advice for staff and governors	020 7340 7264
For local advice:	<a href="mailto:preventreferrals@thamesvalley.pnn.police.uk">preventreferrals@thamesvalley.pnn.police.uk</a> <a href="mailto:Counter-extremism@education.gsi.gov.uk">Counter-extremism@education.gsi.gov.uk</a>
Contact local police force or dial 101 (the non-emergency telephone number)	

## SAFEGUARDING AND CHILD PROTECTION POLICY

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### APPENDIX 2 INDICATORS OF ABUSE AND NEGLECT

All school and college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

**ABUSE:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

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

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

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

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

## SAFEGUARDING AND CHILD PROTECTION POLICY

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### **General signs of abuse**

Abused children may be afraid to tell anybody about the abuse. They may struggle with feelings of guilt, shame or confusion, particularly if the abuser is a parent, caregiver or other close family member or friend. Anyone working with children needs to be vigilant to the signs listed below.

**Whilst these signs do not necessarily mean that a child is being abused, they probably indicate that the child or family is having some problems that should be investigated.**

- Regularly experiencing nightmares or sleeping problems.
- Changes in personality.
- Outbursts of anger.
- Changes in eating habits.
- Showing an inexplicable fear of particular places or making excuses to avoid particular people.
- Self-harming (includes head banging, scratching, cutting).
- Not receiving adequate medical attention after injuries.
- Showing violence to animals, toys, peers or adults.
- Knowledge of 'adult issues' e.g. alcohol, drugs, sexual behaviour.
- Lacking in confidence or often wary/anxious.
- Regressing to the behaviour of younger children.
- Regular flinching in response to sudden but harmless actions, e.g. someone raising a hand quickly.

Whether or not a child's behaviour or appearance is concerning depends on their age or stage of development.

**All staff should be aware that children with learning difficulties and/or special educational needs and/or physical disabilities may be particularly vulnerable to abuse/neglect.**

The school will refer to MKSCB's guidance on 'Levels of Need' and also refer to guidance and practical support found in KCSIE (September 2018), including advice on a Child Missing from Education, Child Sexual Exploitation (CSE), Female Genital Mutilation (FGM) and Preventing Radicalisation.