**Saint Ronan’s School**



SAFEGUARDING POLICY

**Applies to Prep, Pre Prep, Boarding and EYFS**

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| **Author** | Designated Safeguarding Lead  | Date: November 2020 |
| **Reviewed by** | Headmaster | Date: November 2020 |
|  | Senior Management Team  |  |
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|  |  |  |
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| **Approved by Safeguarding Governor** |  | Date: November 2020 |
| **Adopted by Chairman and Governing Body**  | Date: 26th November 2020 |
|  |  |  |
| **Date of Next review** | Designated Safeguarding Lead  | September 2021 |
| Regulatory Compliance | Independent School Standards Regulations (2014) |
|  | National Minimum Standards for Boarding (2015) |
|  | Keeping Children Safe In Education (2021) |
|  |  |  |
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**SAFEGUARDING POLICY**

**1. Introduction**

1.1 Saint Ronan’s recognises its moral and statutory responsibility to safeguard and promote the safety and welfare of every child, acting in their best interest to enable all children to have the best outcomes. Every employee, supply teacher, self-employed teacher, contractor or volunteer who assists at the School is under a general legal duty:

* + - To protect children from abuse
		- To be able to identify welfare concerns among pupils and to identify pupils who need additional support
		- To be aware of the School’s Safeguarding procedures, to know how to access them and to follow them
		- To keep a record of any significant event, complaint or conversation
		- To report any matters of concern to the Designated Safeguarding Lead (DSL)

1.2 This document gives very clear instructions regarding what you should do if you hear or see anything that gives you concern that a pupil at the School may be at risk of harm.

1.3 Everyone at Saint Ronan’s should always maintain an attitude of **‘it could happen here’** where safeguarding is concerned. When dealing with the welfare of a pupil, you must always act in the best interests of the pupil. You must understand your responsibility to safeguard children and you must appropriately share any concerns that you may have about a pupil.

1.4 You should be prepared to identify any pupil that is a ‘Child in Need’ or would benefit from ‘early help’, providing support as soon as a problem emerges. In the first instance you should discuss your concerns with the Designated Safeguarding Lead, who may also liaise with other professionals to support early identification and an early help assessment. Such cases will be kept under constant review and consideration will be given to a referral to the Local Safeguarding Partners if the pupil’s situation is not improving.

1.5 There is an important distinction between action required to ensure the welfare of children who need additional support and urgent action to safeguard children who have suffered or are likely to suffer significant harm. **If a child is in immediate danger or is at risk of harm, a referral to the Local** **Safeguarding Partners and / or the police should be made immediately**. Anyone can make areferral although the Designated Safeguarding Lead should be informed as soon as possible that a referral has been made.

**2.** **Policy Aims**

2.1 This policy is designed to ensure the welfare of pupils at Saint Ronan’s School and on authorised activities away from School, such as School trips and expeditions. The policy is reviewed and updated annually or when required by legislative change.

2.2 We operate our processes with the best interests of the pupil at their heart. We are proud to operate a culture of safety, equality and protection. Where there is a safeguarding concern, we will try to ensure that the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. We manage this by encouraging pupils to be open and frank about their concerns, and providing support from the pastoral team or other responsible adults in all child protection matters.

**Definition of Safeguarding**

2.3 Safeguarding and promoting the welfare of children is defined in the Department for Education’s *Keeping Children Safe in Education* (September 2020) as protecting children from maltreatment;preventing impairment of children’s mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

2.4 Every pupil should feel safe and protected from any form of abuse which, in this policy, means any kind of physical abuse, emotional abuse, sexual abuse or neglect (see point 4.2 below). All children without exception have the right to protection from abuse regardless of gender, ethnicity, disability, sexuality, or beliefs. No child or group of children should be treated any less favourably than others in being able to access services which meet their particular needs.

2.5 Through PHSE topics, tutorials, discussions in Houses, Circle Time, the Curriculum and activities inside and outside of School, pupils are encouraged to gain an understanding of what constitutes acceptable or unacceptable behaviour on the part of adults or other pupils. We support them in developing their own self-confidence and assertiveness, including awareness of the age of consent and abuse of trust. They are informed about this policy and of the various sources of help available at School – including the Pastoral Team, The Headmaster and Mrs TV, The School Matron, the visiting Chaplain, the School’s Independent Listener, House Masters, Tutors and Teachers. Pupils are also made aware of external sources of support, including Childline and the NSPCC.

**Legislation and Guidance underpinning this policy**

2.6 As with all other schools in the UK, we work within a legislative framework that seeks to safeguard and promote the welfare of all children. Our safeguarding policy has been developed in accordance with the principles established in the following:

* + The Children Acts 1989 and 2004
	+ The Education Act 2002
	+ Independent School Standards Regulations 2014 (ISSRs) – statutory regulations
	+ The National Minimum Standards for Boarding Schools (April 2015) (NMS) – statutory guidance –

[link to document](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/416186/20150319_nms_bs_standards.pdf)

* + The Use of Social Media for Online Radicalisation (July 2015) – non-statutory guidance – [link to](https://www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation) [document](https://www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation)
	+ What to do if you’re worried a child is being abused (March 2015) – [link to document](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf)
	+ Children Missing Education (September 2016) – statutory guidance – [link to document](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf)
	+ Teaching Online Safety in School (June 2019) – non-statutory guidance – [link to document](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/811796/Teaching_online_safety_in_school.pdf)
	+ Sexual Violence and Sexual Harassment between Children in Schools and College (December 2017) – [link to document](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf)
	+ Disqualification under the Childcare Act 2006 (September 2018) – statutory guidance – [link to](https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006/disqualification-under-the-childcare-act-2006) [document](https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006/disqualification-under-the-childcare-act-2006)
	+ Information Sharing – Advice for Safeguarding Practitioners (2018) – [link to document](https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice)
	+ Promoting children and young people’s emotional health and wellbeing – [link to document](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/414908/Final_EHWB_draft_20_03_15.pdf)
	+ Counselling in Schools: a blueprint for the future – [link to document](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/497825/Counselling_in_schools.pdf)
	+ Mental Health and behaviour in Schools, 2018 – [link to document](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/755135/Mental_health_and_behaviour_in_schools__.pdf)
	+ Keeping Children Safe in Education (January 2021) (KCSIE) – statutory guidance – [link to](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/954314/Keeping_children_safe_in_education_2020_-_Update_-_January_2021.pdf) [document](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/912592/Keeping_children_safe_in_education_Sep_2020.pdf)
	+ Working Together to Safeguard Children (September 2018) (WTSC) – statutory guidance – [link](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/722305/Working_Together_to_Safeguard_Children_-_Guide.pdf) [to document](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/722305/Working_Together_to_Safeguard_Children_-_Guide.pdf)
	+ Guidance for Safer Working Practice for Adults who work with Children and Young People in Education (May 2019) – non statutory guidance – [link to document](https://www.saferrecruitmentconsortium.org/GSWP%20Sept%202019.pdf)
	+ When to Call the Police – non statutory guidance – [link to document](https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf)
	+ Prevent Duty: Departmental Advice for Schools (June 2015) – non statutory guidance – [link to](https://www.safeguardinginschools.co.uk/wp-content/uploads/2015/07/The-Prevent-Duty-Commentary-Andrew-Hall.pdf) [document](https://www.safeguardinginschools.co.uk/wp-content/uploads/2015/07/The-Prevent-Duty-Commentary-Andrew-Hall.pdf)

2.7 This policy also takes into account the policy and practice of Kent County Council, particularly the inter-agency safeguarding procedures set up by Local Safeguarding Partners (local authority, chief of police and a clinical commissioning group).

2.8 This policy should be read in conjunction with our other policies concerning behaviour, namely our Behaviour Policy, Preventing Bullying and our Acceptable Use Policies.

1. **Safeguarding contact details**

3.1 Our **Designated Safeguarding Lead (DSL)** is Emma Trelawny-Vernon. She is the first point of contact for any safeguarding matter relating to pupils. If she is not available, you should contact one of the Deputy DSLs as listed below. If, for any reason, contact fails and you are concerned that a pupil is in immediate danger please contact Children’s Services directly (details below).

|  |  |  |  |
| --- | --- | --- | --- |
| **Service**  | **Contact if**  | **Name of contact**  | **E mail address**  |
| SRS Chair of Governors  | You have concerns about the conduct of the Headmaster or the DSL  | Andrew Ross  | Via the Clerk to the Governors, John Buckles jcbuckles@saintronans.co.uk  |
| SRS Safeguarding Governor  | You have concerns about safeguarding practices at SRS  | Georgina MacLeay  | Via the Clerk to the Governors, John Buckles JohnBuckles@saintronans.co.uk  |
| SRS Headmaster  | You have concerns about the conduct of a member of staff towards a child  | William Trelawny-Vernon  | Williamtv@saintronans.co.uk  |
| SRS Designated Safeguarding Lead  | You have any concerns about a child. You have concerns about any safeguarding related matter at SRS  | Emma Trelawny-Vernon  | Emmatv@saintronans.co.uk Safeguarding@saintronans.co.uk |
| SRS Deputy Safeguarding Lead and Head of Pastoral Care  | **In the absence of the DSL** you have any concerns about a child. You have concerns about any safeguarding related matter in the Prep School at SRS  | Ross Andrew  | rossandrew@saintronans.co.uk  |
| SRS Deputy Safeguarding Lead Pre Prep and EYFS  | **In the absence of the DSL** you have any concerns about a child. You have concerns about any safeguarding related matter in the Pre Prep or EYFS at SRS  | Andrea Bright  | andreabright@saintronans.co.uk  |
| SRS Matron  | You have concerns about a child | Angela Bouchard  | angelabouchard@saintronans.co.uk  |
| KCC Early Help  | Where there is a need for family support at the earliest stages |   | TunbridgeWellsEarlyHelp@kent.gov.uk  |
| Area Safeguarding Advisor  | If you have concerns about a child or for the School to obtain advice informally on borderline cases  | Gemma Wilson  | 03000 412284 07540 677200 07976581937 Gemma.willson@theeducationpeople.org  |
| LADO. Local Authority Designated Officer Team  | Allegations against staff  |   | 03000 410888 kentchildrenslado@kent.gov.uk  |
| Head of Service Educational Safeguarding  | Ditto plus FGM advice.  | Claire Ray  | 03000 412284 07920 108828 Claire.ray@theeducationpeople.org  |
| E safety Officer  | If you have concerns about e safety and online issues  | Rebecca Avery  | 03000 415797 Mobile 07789 968705 Rebecca.avery@theeducationpeople.org  |
| Kent Police Headquarters  | Serious concerns relating to the Prevent Duty  |   | 01622 690690 101   |
| DfE helpline re extremism  | Serious concerns re extremism  |   | 020 7340 7264 Counter-extremism@education. gov.uk   |
| Integrated Front Door  | Where a child is at risk of harm  |   | 03000 41 11 11 Out of Hours emergency 03000 419191  |
| Childline  | For advice  |   | 0800 1111  |
| Office of the children’s commissioner |   |   | 020 7783 8330  |
| Independent listener  | For independent help.  | Dr Jo Christophers  | E mail: joelladavies@gmail.com.Phone: 07818424651 |
| CEOP  |   |   | 0870 000 3344  |
| NSPCC helpline  |   |   | 0808 800 5000  |

When dealing with allegations, concerns, suspicions and allegations, the Safeguarding team work in the Kent Safeguarding Children Multi-agency Partnership (KSCMP). All organisations involved in children’s care work in line with the guidance given in Working together to Safeguard Children (July 2018). Staff and parents may contact any group directly. The table below has the relevant contact details and outlines the structure of Kent’s services.



|  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
|   |  |  |  |  |  |  |  |  |  |  |

3.3 If you believe that a pupil is in immediate danger or at risk of harm, you can make an immediate referral to children's social care and/or the police. **Anyone can make a referral.** You should inform the DSL as soon as possible that a referral has been made.

**4.** **Policy Details**

4.1 A Listening School

We take a child-centred approach and try to ensure that pupils have a voice and are able to express any concerns that they may have. You are reminded that **it could happen here** and that we must always take the concerns of pupils seriously. **Safeguarding trumps everything else** – you must, without fail, make time to listen to any pupil who shows signs of distress or who wishes to confide in you.

4.2 Types of Abuse

4.2.1 Abuse involves maltreatment of a child. The definition of child abuse is wide in order to cover all forms of cruelty that children may endure in their lives. Abuse, neglect and safeguarding issues are rarely standalone events. In many cases, multiple issues overlap with one another. 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 happen 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. Abuse can take four main forms; Physical, Emotional, Sexual, Neglect

4.2.2 **Physical abuse** is a form of abuse which may involve hitting, shaking, throwing, poisoning, burningor 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.

4.2.3 **Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe andpersistent adverse effects on a child’s emotional development. For example, it may involve telling a child that they are worthless, unloved or 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 participating in normal social interaction. It may involve seeing or hearing the ill-treatment of others, which may be through domestic abuse. 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.

4.2.4 **Sexual abuse** involves forcing or enticing a young person to take part in sexual activities, notnecessarily 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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. 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.

4.2.5 **Neglect** is the persistent failure to meet a child’s basic physical and/or psychological needs, likely toresult in the serious impairment of health or development. 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 carers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

4.2.6 Section 5 gives more information on **Child Sexual Exploitation, Child Criminal Exploitation and Peer on Peer Abuse**. Appendix B of this policy also sets out further detail of possible signs of abuse and of grooming.

4.3 Procedure to Follow

4.3.1 We follow specific procedures to protect children who are suffering harm or at risk of suffering harm as a result of physical, sexual, and/or emotional abuse or neglect in accordance with Section 157 of the Education Act 2002.

4.3.2 If you are told of any incident or have a strong suspicion of physical, emotional or sexual child abuse or neglect (including attempts to radicalise or coerce individuals to hold extreme political or religious views) occurring in the School, outside the School linked to members of School staff (including volunteers, agency and supply staff and contractors) or to a pupil of the School at home or outside the School, you must report this the same day to the DSL. In the absence of the DSL, the immediate report should be made to one of the Deputy DSLs. If the allegation concerns a member of staff the matter must be reported immediately to the Headmaster (or to the DSL if the Headmaster is unavailable). If the allegation or suspicion is about the Headmaster, or the DSL, the report should be made to the Chairman of the Governors or directly to the LADO without informing the Headmaster.

4.3.3 You should report any abuse of a pupil that you become aware of (or suspect) including any abuse that occurs online. This may include possible abuse of a pupil by a staff member or another adult, abuse at home or perpetrated on their family members, abuse by a stranger, and abuse of a pupil/pupils by another pupil or group of pupils.

4.3.4 You should be aware that safeguarding incidents and/or risk associated behaviours can be associated with factors outside of the School and occur between young people outside of the School environment. All staff should consider whether children are at risk of abuse or exploitation in situations outside the School or their families. Extra familial harm can take a variety of different forms including (but not limited to) parental neglect, inadequate supervision, sexual exploitation, criminal exploitation and serious youth violence.

4.3.5 School staff (including the DSL, the Deputy DSLs and the Headmaster) must not investigate reports of abuse themselves. Alleged victims, perpetrators, those reporting abuse and others involved should not be interviewed by School staff beyond the point at which it is clear that there is an allegation of abuse.

4.3.6 If someone tells you about an allegation of physical, sexual, emotional abuse or neglect you must follow the procedures on the next page (**the ‘Six R’s’**). You should record in writing all concerns, discussions and decisions (together with reasons) made under these procedures. You may use our Disclosure Form (Appendix A) for this purpose if you wish. This record should include the date, time and place of the conversation and detail of what was said and done by whom and in whose presence. The record should be signed by the person writing it.

4.3.7 Do not assume another colleague or professional will take action. Safeguarding is everyone’s responsibility. If you are worried about a pupil or have any suspicions, however small, talk to one of Saint Ronan’s safeguarding team immediately. You do not have to wait for proof of your concerns. **Do** **not attempt to investigate the issue yourself.**

#### 4.3.8 Dealing with an allegation from a child, and a child protection case, is likely to be a stressful experience. The member of staff should therefore consider seeking support for him/herself and discuss this with the DSL. As every case will be handled with confidentiality (as far as is possible), any child should be able to continue at the School, confident that any incident is not general knowledge. The same will apply for a member of staff in cases of resuming work after an accusation. Counselling may be offered and organised.

4.4 What to do if someone makes a disclosure – ‘The Six Rs’



**READY**

**RECEIVE**

**REASSURE**

**RESPOND**

**RECORD**

**REPORT**

* + - * A pupil may wish to talk to you at any point - if this involves safeguarding you must be prepared to listen immediately.
			* Do not ask the pupil to come back later or to make an appointment.
			* The pupil has chosen you - you are in a position of trust.
			* Listen carefully to what they say.
			* Do not show shock or disbelief.
			* Take it seriously.
* Tell the pupil that they have done the right thing by speaking out.
* **Do not promise confidentiality** - you have a duty to refer. You can, however,state that information will only be shared with the people who need to know.
* Alleviate guilt - the pupil is not to blame and they did the right thing in coming to you.
	+ - **Do not ask leading questions** (e.g., 'did X do this to you?') or interrogate them.
		- Do not criticise the alleged perpetrator.
		- Do not ask the pupil to repeat the matter to another member of staff. Explain that you need to talk to the DSL.
		- **Do not investigate the matter yourself.**
	+ Make brief notes if you can during the meeting or, if not, immediately afterwards.
	+ Keep your original notes.
	+ Record the date, time, place and the actual words used by the pupil.
	+ Record statements and actions rather than your interpretation.
	+ Immediately contact the School DSL or the Headmaster as appropriate.
	+ You can use the reporting form attached in Appendix A as the DSL may have to make your record available to Children's Services

4.5 What to do if you suspect a pupil is suffering or likely to suffer harm

Is emergency medical assistance required?

|  |  |
| --- | --- |
| No | Yes |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|  |  |  | Is there an urgent welfare issue? Contact DSL/DDSL immediately if there is |  |  |
|  | Seek medical help, |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  | alerting medical |
|  |  |  |  |  |  |  |  |  | You suspect an issue, but no |  |  |
|  |  |  | Pupil wishes to make a |  |  |  | staff that it is a |
|  |  |  | disclosure to you |  |  | disclosure is made |  | safeguarding issue |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  | Alert the pupil to the fact |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  | Notify the |
|  |  |  | that you cannot maintain |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  | DSL/DDSL as soon |
|  |  |  | confidentiality. |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  | as reasonably |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  | practicable |
|  | Pupil refuses to |  |  | Pupil continues |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  | disclose due to |  |  | to make a |  |  |  |  |  |  |
|  |  |  | non- |  |  | disclosure to |  |  |  |  |  | Complete the |
|  | confidentiality |  |  | you |  |  |  |  |  |
|  |  |  |  |  |  |  |  | Report Form |
|  |  |  |  |  |  |  |  |  |  |  |  |  | (attached in |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  | Appendix A) |
|  | Be supportive, |  |  | Listen/make |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  | notes (follow |  |  |  |  |  |  |
|  | explain you will |  |  |  |  |  |  |  |  |
|  |  |  | The Six Rs) |  |  |  |  |  | Maintain |
|  | be there when |  |  |  |  |  |  |  |
|  | they are ready |  |  |  |  |  |  |  |  |  | confidentiality. The |
|  |  |  |  |  |  |  |  |  |  | DSL/DDSL will |
|  |  | to talk |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  | contact all relevant |
|  |  |  |  |  |  | Does it relate to a member of staff? |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  | parties at the |
|  |  |  |  |  |  |  |  |  |  |  |  |  | appropriate time |



|  |  |
| --- | --- |
| No | Yes |

|  |  |  |
| --- | --- | --- |
| Alert the DSL/DDSL immediately |  | Any concerns about a member of |
|  | Staff should be made in accordance with the protocol herein. Concerns can be raised in confidence.  |
|  |  |
|  |  |  |
|  |  |  |
|  |  |  |
| Complete the Report Form (attached in |
|  |  |
| Appendix A) |  |
|  |  |
|  |  |  |



**5.** **Concerns about a Pupil**

5.1 Early Help, Child in Need, Child at Risk

5.1.1 Concerns about a pupil may fall into one or more of several categories, of which the most important are as follows:

5.1.2 **Early Help and Preventative Services**. Some pupils may benefit from early help, and you are expected to try to identify suchpupils where possible. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. In the first instance, if you consider that a pupil may benefit from early help you should discuss this with the DSL. The DSL will consider the appropriate action to take in accordance with the [Kent Children’s Services Support Level Guidance](https://www.kelsi.org.uk/__data/assets/pdf_file/0010/86464/Support-Levels-Guidance-Sheet.pdf) . The DSL will liaise, if necessary, with Children’s Services via the [Integrated Front Door](https://www.kelsi.org.uk/special-education-needs/integrated-childrens-services/front-door).

5.1.3 Any pupil may benefit from early help, but you should be particularly alert to the potential need for early help for a child who:

* is disabled and has specific additional needs;
* has special educational needs (whether or not they have a statutory education, health and care plan);
* was a young carer, or who has siblings who have taken on the primary carer role;
* is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement or association with organised crime groups;
* is frequently missing;
* is misusing drugs or alcohol;
* is at risk of modern slavery, trafficking or exploitation;
* is from a family where circumstances are presenting challenges for the child, such as substance abuse, adult mental health problems, domestic abuse or a family member in prison;
* was previously in care;
* is showing early signs of abuse and/or neglect;
* is at risk of being radicalised or exploited; or
* is a privately fostered child.

5.1.4 **A Child in Need** refers to a pupil who is unlikely to achieve or maintain a reasonable level of health or development, or whose development is likely to be significantly or further impaired without the provision of services. These pupils will be referred to Children’s Services via the Integrated Front Door and will benefit from additional support which should be put in place as soon as a problem is identified.

5.1.5 **A Child at Risk** is a pupil who is at risk of significant harm (which may or may not be abuse). Suchcases will be referred to Children’s Services immediately in accordance with the procedures outlined in this policy. The Children’s Services Support level guidance will determine the level of support the pupil requires.

5.2 Pupil at risk of immediate harm

5.2.1 If you believe that a pupil is in immediate danger or at risk of harm, you should make an immediate referral to children's social care and/or the police. **Anyone can make a referral.** Any such referral must be made immediately and in any event within 24 hours (one working day) of you becoming aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. If anyone other than the DSL makes a referral, you should inform the DSL as soon as possible that a referral has been made. You should challenge any inaction and follow this up with the DSL and children’s social care as appropriate. All concerns, discussions and decisions made
and the reasons for those decisions should be recorded in writing.

5.2.2 Kent Safeguarding Children Multi-agency partnership work with the School and their local procedures can be found [here](https://www.proceduresonline.com/kentandmedway/chapters/contents.html).

5.3 Pupil at risk of radicalisation

5.3.1 We are fully committed to safeguarding and promoting the welfare of all our pupils. Every member of staff recognises that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today’s society.

5.3.2 Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. ‘Extremism’ is defined in the Prevent strategy as 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.

5.3.3 Signs of radicalisation: There is no single way of identifying an individual who is likely to be susceptible to extremist ideology. It can happen in many different ways and settings. Background factors may contribute to vulnerability and are often combined with influences such as family, friends or online, and with particular needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people. As with managing other safeguarding risks, you should be alert to changes in pupils’ behaviour which could indicate that they may be in need of help or protection. You should use your professional judgement in identifying pupils who might be at risk of radicalisation and act proportionately. Such cases may involve a referral to the Channel programme or to children's social care depending on the level of risk. Channel is a voluntary programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.

5.3.4 We recognise that some pupils may be in danger of being drawn into terrorism or other forms of extremism and carry out appropriate risk assessments. This may involve consultation with local partners, such as the police, about the potential risk in the local area. Such risk assessment is discussed with the Headmaster, the DSL, Deputy DSLs and the Governor responsible for safeguarding to ensure our safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism. The Risk Assessment is regularly reviewed.

5.3.5 We take appropriate measures to ensure that visiting speakers are vetted and that they are always accompanied while on School premises. Oversight ensures that the ideas disseminated are aligned with the values of the School and fundamental British values.

5.3.6 Working in partnership: The DSL will maintain existing partnership arrangements and keep open lines of communication with the School’s Local Safeguarding Partners.

5.3.7 Staff training: The DSL and the Deputy DSLs have undertaken Prevent awareness training and are able to provide advice and support to other members of staff on protecting children from the risk of radicalisation. All staff have been made aware of the Prevent duty through training.

5.3.8 IT: Suitable filtering is provided and periodically reviewed to keep pupils safe from terrorist and extremist material when accessing the internet in School.

5.3.9 Procedures: If you are concerned that a pupil may be exposed to radicalisation the normal referral processes apply i.e., you should discuss your concerns with the DSL, who will follow the safeguarding

Procedures outlined in this policy and may also make a referral to the Channel programme. Borderline cases will be discussed with the Channel Panel on a no-names basis.

5.3.10 For further advice about extremism the DfE provide a dedicated telephone helpline and mailbox for non-emergency advice for staff and Governors: they can be contacted on 020 7340 7264 or counterextremism@education.gsi.gov.uk or contact 101 (non-emergency number for the police).

5.4 Pupil missing from education

5.4.1 A child going missing from education is a potential indicator of abuse. Attendance is registered in accordance with Department for Education requirements and staff are aware of how to deal with situations where pupils go missing either from School or on a School trip. Details of these procedures are outlined in the Missing Pupil Policy.

5.4.2 We have a thorough attendance monitoring policy and there are clear procedures in place to deal with instances of pupils going missing from School.

5.5 Child Exploitation

5.5.1 **Child Criminal Exploitation (CCE):** is where an individual or group takes advantage of animbalance of power to coerce, control, manipulate or deceive a child into any criminal activity either in exchange for something the victim needs or wants, and/or for the financial or other advantage for the perpetrator and/or through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not have to include physical contact, it can also occur through the use of technology. The most prolific form of CCE is where children are exploited and coerced to carry drugs or other contraband from urban areas to suburban and rural areas (**‘county lines’**). Indicators that may signal a pupil is at risk from or involved with CCE can include increased absences, a change in friendships or relationships with older individuals, a significant decline in performance, signs of self-harm or a significant change in wellbeing. Unexplained gifts or new possessions could also indicate that pupils have been approached by, or are involved with individuals associated with criminal networks or gangs and may be exposed to youth violence through initiation or hazing. If you are concerned you should contact the DSL. Additional advice can be found in Preventing Youth Violence and Gang Involvement [(link here)](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf) and Criminal Exploitation of Children and Vulnerable Adults: County Lines [(link here).](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741194/HOCountyLinesGuidanceSept2018.pdf)

5.5.2 **Child Sexual Exploitation (CSE)**: involves young people who are sexually abused or coerced intosexual activity in the context of exploitative relationships by a person/persons of any age, including another young person. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not have to include physical contact, it can also occur through the use of technology. CSE can affect any child or young person under the age of 18, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the young person’s immediate knowledge (e.g., through others copying images they have created and posted on social media). Indicators of CCE (above) can also be indicators of CSE as can pupils who have older partners and pupils who suffer from sexually transmitted infections.

5.53 Child Trafficking is where a child or young person is transported using force, coercion or deception for the purposes of exploitation (e.g., sexual or modern slavery). Children can be trafficked into, out of, or around the UK. Any concerns should be reported directly to the DSL.

5.6 Peer on peer abuse (see Behaviour Policy and Anti Bullying Policy)

5.6.1 Abuse can take place between pupils and this type of abuse can be physical, sexual or emotional in

nature. This peer on peer abuse can manifest itself in various ways and is most likely to include, but not limited to: bullying (including cyber bullying, homophobic bullying and transgender bullying), gender-based violence/sexual assaults, sexual harassment, initiations and ‘sexting’ (also known as youth produced sexual imagery). Peer abuse will not be tolerated; abuse is abuse and must not be passed off as ‘banter’ or as ‘part of growing up’. Victims of peer abuse should be supported as they would be if they were the victim of any other form of abuse, in accordance with this policy. If the threshold does not reach the level to constitute a safeguarding investigation, perpetrators will be dealt with in accordance with our Behaviour Policy.

5.6.2 Pupils with SEN or disabilities could be more vulnerable to peer on peer abuse and be disproportionately impacted without showing any outward signs. Staff must bear these vulnerabilities in mind when responding the allegations and dealing with incidents.

5.6.3 Peer on peer abuse can take the form of harmful sexual behaviour. It is important that all victims are taken seriously and offered appropriate support, though it should be noted that current evidence has shown overwhelmingly that girls are more likely to be the victims of such abuse or harassment and boys the perpetrators. Through the PSHE and RSE programmes the School attempts to foster healthy and respectful relationships between pupils, and between pupils and pupils at other schools – both male and female. You must always take seriously any allegation of sexual misconduct, and follow the procedures outlined in this policy if you are made aware of reports of sexual violence or sexual harassment. You should be aware that rape, assault by penetration or other forms of sexual assault (including ‘upskirting’) are crimes and will be reported to the police as well as to Children’s Services. Remember that sharing sexual images of a person under the age of 18 (‘sexting’) is still illegal even if the culprits are under 18 or if the picture is of themselves. We will at all times follow the guidance outlined in the Department for Education document: Sexual Violence and Sexual Harassment between Children in Schools and Colleges (December 2017).

5.6.4 Much peer on peer abuse takes place online. It can take place wholly online or technology may be used to facilitate offline abuse. Pupils are regularly reminded of the School’s policy on bullying and on cyberbullying, and sign an Acceptable Use Agreement which governs their behaviour on the School network.

5.6.5 ‘Upskirting’ is a form of abuse which typically involves taking a picture under a person’s clothing without their knowledge, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It has now been classed as a criminal offence. This behaviour, if witnessed, should be notified to the DSL immediately. It is important to note that whilst the phrase is ‘upskirting’ it can apply equally to men and women as in addition to skirts it also includes photographs taken of people wearing kilts, cassocks, shorts or trousers.

5.6.6 Peer on peer abuse can manifest itself in many ways. Some forms of peer on peer abuse are:

**Bullying**:Bullying is any behaviour that is can be a single event or be repeated over time and intentionally hurtsanother pupil or group of pupils physically or emotionally. It can occur directly or through cyber-technology (social websites, mobile phones, text messages, photographs and email) and always involves an imbalance of power. It can cause long lasting psychological effects. Peer on peer abuse is bullying of a serious or sexual nature between persons of a similar age which results in or has the potential to cause significant harm.

**Physical abuse**: this includes hitting, kicking, shaking, biting, slapping, or otherwisecausing physical harm to another young person.

**Harmful Sexual Behaviour**: refers to any young person, under the age of 18, whodemonstrates behaviour outside of their normative parameters of development (this includes, but is not exclusive to abusive or violent behaviours).

**Serious Youth Crime (including sexual assault)**: includes crimes of the mostserious nature including murder, rape and GBH perpetrated on or between young people under 18.

**Sexting / Youth Produced Sexual Imagery**:this is when someone sends or receives a sexually explicit text, image or video.Pressuring someone into sending a nude or sexually explicit picture can happen in any relationship and to anyone, whatever their age, gender or sexual preference. Once the image is taken and sent, the sender has lost control of the image and these images could end up anywhere or be stored indefinitely. Possessing or distributing indecent images of a person under 18 is a crime under the Sexual Offences Act 2003. **Report any incident involving youth produced sexual imagery to the DSL immediately.** Never view, download or share the image or ask the child to delete it.

**Sexual harassment**:refers to ‘unwanted conduct of a sexual nature’ that can occurboth online and offline. Sexual harassment is likely to violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment by other pupils can include:

* Sexual comments such as telling sexual stories, making lewd comments, making sexual remarks about clothing or appearance and calling someone sexualised names.
* Sexual “jokes” or taunting.
* Physical behaviour, such as deliberately brushing against someone, interfering with someone’s clothes or displaying pictures, photos or drawings of a sexual nature.
* Upskirting.
* Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include non-consensual sharing of sexual images and videos, sexualised online bullying, unwanted sexual comments and messages and online sexual exploitation, coercion and threats.

**Gangs/ youth violence including initiation/hazing:** The School recognises the risks posed to children in relation to involvement in gang-related activity whish may be street gang, peer group or organised crime. Young people who are involved in gangs are more likely to suffer harm themselves, through retaliatory violence, displaced retaliation, and territorial violence with other gangs or other harm suffered whilst committing a crime. In addition, children may experience violence as part of initiation or hazing practises. The School understands that Early Help can be crucial in the early identification of children who may need additional support due to gang-related activity and as such will provide an Early Help response when concerns are raised about indicators of gang activity. If information suggests a child may be at risk of significant harm due to gang related activity, a referral will be made.

##### Domestic abuse: This is defined as “any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse by those aged 16 or over who have been intimate partners of family members. This can encompass, but is not limited to:

##### Psychological/emotional abuse – intimidation and threats, social isolation, verbal abuse, constant criticism, enforced trivial routines.

##### Physical violence – slapping, pushing, kicking, punching, stabbing, damage to property or items of sentimental value, attempted murder or murder.

##### Physical restriction of freedom – controlling who the victim or children see or where they go, what they can do, stalking, imprisonment.

##### Sexual violence or financial abuse – stealing, depriving or taking control of money, etc.

##### Domestic abuse can be perpetrated by men to women and vice versa, can occur within same sex relationships and to/from a child to an adult. Children’s exposure to adult conflict, even when violence is not present, can lead to serious anxiety and distress. It can also have a serious impact on a child’s development and emotional wellbeing. Consideration must also be given to young people who may themselves be in a violent relationship and be suffering or likely to suffer significant harm.

Children experiencing/witnessing domestic abuse may:

* + - Become aggressive
		- Display anti-social behaviour
		- Suffer from depression or anxiety
		- May not achieve as well at school/may not attend school

Staff must escalate any concerns or information they have in this regard to the DSL immediately.

5.6.7 In the case of abuse by a pupil, or group of pupils, the key issues identifying the problem as abuse are:

* The frequency, nature and severity of the incidents.
* Whether the victim was coerced by physical force, fear, or by a pupil or group of pupils significantly older than them or having power or authority over them.
* Whether the incident involved a potentially criminal act and whether, if the same incident (or injury) had occurred to a member of staff or other adult, it would have been regarded as assault or otherwise actionable.

5.6.8 Where an allegation of abuse against one or more pupils has been made or where you are concerned about peer on peer abuse, the child protection procedures set out in this policy should be followed and the DSL informed. The pupil(s) accused of abuse and the victim of abuse will both be treated as ‘at risk’ and a referral will be made to children's social care in respect of either pupil if that pupil is suffering or is at risk of harm.

5.6.9 If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, we will ensure that, subject to the advice of the Local Authority Designated Officer (LADO), parents are informed as soon as possible and the pupil is supported during the interview by an appropriate adult.

5.6.10 Support for those involved in peer on peer abuse (both parties) will be offered through the pastoral team, with regular monitoring by the DSL. Counselling will be suggested to the parents if considered helpful. If Children’s Services have been involved then support may be provided through the Early Help or wider safeguarding team.

5.7 Online Safety (see Online Safety Policy)

5.7.1 Many of the concerns described above (for example sexual abuse, severe bullying and extremism and radicalisation) may occur online. We ensure that the School network is appropriately filtered and pupils and staff are guided in the acceptable use of our network and the internet in general (all advice is in line with the Department of Education guidance document, Teaching Online Safety in School 2019). Pupils are required to sign an Acceptable Use Agreement and are given advice on keeping safe online through computer technology lessons, specific lectures on e-Safety and within our PSHE and RSE courses. Our Online Safety Policy is available to read on the website.

5.7.2 Any evidence that a pupil may be at risk online or indeed is being harmed online should be brought to the immediate attention of the DSL or a DDSL so that it can be taken forward as a child protection issue.

5.7.3 Staff receive training relating to online safety as part of their regularly updated safeguarding training.

5.7.4 In cases of pupils sexting or sharing pornographic images online, you are reminded that it is illegal to possess, store or distribute an image containing sexual imagery of a child under 18, even if the possessor is under 18 and/or the image shared is of themselves, therefore when taking a disclosure from a pupil concerning this issue you should avoid viewing or forwarding the image and instead alert the DSL or DDSL to the image’s existence.

* 1. Mobile Phones (see Mobile Phone Policy)

5.8.1 Personal mobile phones belonging to EYFS staff must not be taken in to the classroom. These must be stored in the locked cupboard provided.

Personal mobile phones must not be on their person when they are in contact with children.

5.9 Safeguarding SEND pupils

5.9.1 Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. Additional barriers can exist when recognising abuse or neglect in this group of children. These can include:

* + assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s disability without further exploration;
	+ children with special educational needs and disabilities can be disproportionally impacted by actions such as bullying without outwardly showing any signs; and
	+ communication barriers and difficulties in overcoming these barriers

5.9.2 You must always be prepared to support SEND pupils in expressing any concerns they may have and be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

5.10 Safeguarding and Mental Health (see Positive Mental Health Policy)

5.10.1 You should consider that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health issue. However, you are well placed to observe pupils day-to-day and identify those whose behaviour suggests they may be experiencing a mental health problem or be at risk of developing one.

5.10.2 If you have a mental health concern about a pupil that indicates they may be suffering – or at risk of suffering – serious harm, you must contact the DSL or one of the DDSLs immediately.

5.10.3 The DfE has published advice and guidance on [Preventing and Tackling Bullying,](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/623895/Preventing_and_tackling_bullying_advice.pdf) and [Mental Health](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/755135/Mental_health_and_behaviour_in_schools__.pdf) [and Behaviour in Schools.](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/755135/Mental_health_and_behaviour_in_schools__.pdf) In addition to this, Public Health England has produced a range of resources to promote positive health, wellbeing and resilience among young people including its guidance [Promoting children and young people’s emotional health and wellbeing.](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/414908/Final_EHWB_draft_20_03_15.pdf)

5.11Pupils who are looked after children, or were previously looked after children

5.11.1 Pupils who are looked after by a local authority, or who were previously looked after, can face additional safeguarding issues. If you have any concerns you should contact the DSL.

5.12 Pupil reporting Honour Based Abuse (HBA)

5.12.1 Honour based abuse is a general term which includes incidents or crimes which have been committed to protect or defend the ‘honour’ of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. If any evidence of such practices within a family comes to light you must report the matter to the DSL or DDSL immediately.

5.12.2 If you learn that an act of FGM appears to have been carried out on a girl aged under 18, you have a statutory duty to report it to the police. You should also follow the usual safeguarding procedures set out in this policy and report the matter to the DSL who will involve Children's Services where appropriate. There is a range of potential indications that a girl may be at risk or has already suffered from FGM. Further information is available within *Keeping Children Safe in Education* (September 2020). See Appendix C.

5.13 Dealing with allegations against a pupil

5.13.1 When an allegation of abuse is made against a pupil the DSL will inform Children’s Services and discuss the allegation with the Local Authority Designated Officer (LADO) in accordance with the procedures outlined in this policy. The threshold for dealing with an issue of pupil behaviour under the safeguarding policy is when there is a reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. We will take advice from the LADO on the investigation of such allegations and will take appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse. If the matter does not reach the threshold for referral or if there is no intervention by Children’s Services or police, the School may nonetheless take action in relation to the allegation in accordance with its own Behaviour Policy and/or the parent contract.

1. **Concerns about a member of staff** (see Managing Allegations Against Staff and the Staff Code of Conduct)

6.1 Child protection concerns

6.1.1 If you are concerned about the behaviour of a colleague towards a pupil or pupils you may worry that you have misunderstood the situation or wonder whether a report could jeopardise a colleague’s career. However, any concern about a member of staff must be raised immediately (see section 6.2) **regardless of how unlikely it seems that there would be any substance to the** **concern**. No further action may be necessary but it is important that such information is brought tothe School’s attention as soon as possible. You must remember that in all situations **the welfare** **of the child is paramount**.

6.1.2 Our reporting procedures for managing concerns/allegations against staff are in line with Part Four of Keeping Children Safe in Education and Local Safeguarding Partner arrangements. They apply when staff have, or are alleged to 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.

6.1.3 When you report a concern of this nature you can expect:

* + - the concern to be taken seriously;
		- your identity to remain confidential (if this is your wish), unless you are later required to act as a witness in court proceedings;
		- to be protected as far as possible from victimisation or harassment;
		- for an initial inquiry to take place to identify any action necessary;
		- Children’s Services and the police to be involved if the concern relates to abuse or neglect or the potential commission of a crime;
		- written confirmation that your concern has been received and is being dealt with; and
		- to be informed of the final outcome where possible, subject to the constraints of confidentiality and legal advice (please note, if restrictions are in place, or if we have received specific direction from the LADO or the police, communication with the reporting party might not be permissible).

6.1.4 If you feel the School is not dealing with a matter in accordance with our procedures, you should follow the Whistleblowing Procedure.

6.2 How to raise a concern about an adult

6.2.1 If you have child protection concerns about the behaviour of a colleague, or about a School practice, which is likely to put pupils at risk of abuse or other serious harm, you **must** report it immediately, using one of the steps outlined below:

**Allegations against staff, volunteers, supply staff, peripatetic staff or contractors**: If you are making an allegation or complaintagainst any such member of staff you should report it immediately to the Headmaster (or to the DSL if the Headmaster is unavailable).

**Allegations against the Headmaster or DSL**: If you are making an allegation against the Headmaster or DSL,you should report it to the Chairman of the Governors or directly to the LADO if the Chairman is not available, without notifying the Headmaster or DSL.

**Allegations against the Chairman**:If you are making an allegation against theChairman you should report it to the LADO.

6.2.2 Allegations against a staff member who is no longer working at the School or no longer teaching will be referred to the police and any relevant authorities. Historical (non-recent) allegations of abuse will be referred to the police and to the LADO.

6.3 What happens when an allegation has been made?

6.3.1 We will deal with any allegation of inappropriate behaviour that harms, or may cause harm to a pupil or pupils, as an immediate priority.

6.3.2 If an allegation is made against anyone working or volunteering at the School, we will not undertake our own investigation into the allegation without prior consultation with the Local Authority Designated Officer (LADO) or, in the most serious cases, the police, so as not to jeopardise statutory investigations

It is important that staff do not carry out their own investigations.

6.3.3 Once an allegation has been made, which appears to meet the reporting criteria (section 6.1.2) the Headmaster (or Chairman, depending on who the allegation has been made against), will immediately contact the LADO to discuss the nature, content and context of the allegation and agree a course of action. The LADO must be informed within one working day of any allegation reported to the School that appears to meet the criteria or of any allegations that are made directly to the police. All discussions with the LADO will be recorded in writing. We will follow advice from the LADO about how to approach the matter in question, whether the police are to be involved and whether there is to be a strategy meeting. We will also take direction from the LADO as to what we may communicate to:

1. the person about whom allegations have been made,
2. the person who has raised the allegation, and
3. (if it concerns a pupil) their parents.

6.3.4 The Headmaster or Chairman will ensure that the individual against whom the allegation has been made is notified as soon as possible and given an explanation of the likely course of action (unless there is an objection from the police). A named representative will be appointed to keep the individual informed of the progress of the case and to arrange appropriate support.

6.3.5 Careful consideration will be given to whether the circumstances of the case warrant suspension whilst the allegation is investigated or whether alternative arrangements can be put in place. Alternative accommodation will be arranged (away from pupils) in cases where a member of boarding staff is suspended pending an investigation of a child protection nature.

6.3.6 The Headmaster or Chairman (depending on who the issue was reported to) will, after consultation with the LADO and/or the police, inform the parents and provide regular updates as soon as permissible.

6.3.7 Where an allegation is made against a staff member not directly employed by us such as supply staff or agency staff, the Headmaster will immediately contact both the company concerned and the LADO to discuss the nature, content and context of the allegation, in order that all parties can work together to agree a course of action. We will continue to support any investigation that is required.

6.4 How an individual will be treated if an allegation is raised against them

6.4.1 The School’s Disciplinary Procedure may apply in the event of an allegation being made.

6.4.2 The School will make every effort to maintain confidentiality and guard against unwanted publicity. These restrictions will apply up to the point where the accused person is charged with an offence or the Teaching Regulation Agency (TRA) publishes information about an investigation or decision in a disciplinary case.

6.4.3 Allegations found to be malicious will be removed from the personnel record of the individual concerned. In all other cases a written record of the decision will be placed on their file in accordance with KCSIE and a copy provided to the individual concerned. Allegations which are false, malicious, unfounded or unsubstantiated will not be included within the individual’s future references.

6.5 Whistleblowing Procedure (see Whistleblowing Procedures)

6.5.1 You should always feel able to raise concerns about poor or unsafe practices and potential failures in our safeguarding regime. If you have concerns that we are not dealing with a child protection matter in accordance with our stated procedures, you should raise it under the School’s Whistleblowing Policy.

6.5.2 Alternatively, if you feel that your genuine concerns are not being addressed, you may contact the NSPCC whistleblowing advice line (0800 028 0285 or help@nspcc.org.uk) or contact the Local Authority Designated Officer (LADO) when appropriate to do so in accordance with Keeping Children Safe in Education.

6.5.3 There will be no retribution or disciplinary action taken against you for making such a report provided that it is done in good faith. Malicious allegations may be considered a disciplinary offence.

1. **Management of Safeguarding**

We follow rigorous procedures to ensure that the welfare of pupils is paramount. These include the following:

7.1 Safer Recruitment (see Safer Recruitment Policy)

7.1.1 We take seriously our responsibility to recruit staff, contractors and volunteers who are suitable to work with children. The first step to safeguarding all pupils is to appoint staff who share our commitment to the welfare of the pupils. The Recruitment Policy is available on request.

7.1.2 We undertake a rigorous recruitment and screening process, which is in line with the Independent Schools’ Inspectorate, *Keeping Children Safe in Education* and National Minimum Boarding Standards regulations. The key staff who manage this process are trained in safer recruitment procedures.

7.13 We will take all reasonable measures to:

* ensure that we practise safer recruitment in checking the suitability of staff and volunteers (including staff employed by another organisation) to work with children and young people in accordance with the guidance given in *Keeping Children Safe in Education* (September 2020) and the Education (Independent School Standards) (England) Regulations 2014. Procedures are outlined in the School’s Recruitment Policy.
* ensure that where staff from another organisation are working with our pupils we have received confirmation that appropriate child protection checks and procedures apply to those staff and that such checks do not raise any issues of concern in relation to the suitability of those staff members to work with children.
* ensure that where the School ceases to use the services of any person (whether employed, contracted or volunteer) because that person was considered unsuitable to work with children, a detailed report is made to the Disclosure and Barring Service (DBS) as soon as possible after the person has ceased to provide services to the School and in any event within one month of the person leaving the School. This includes dismissal, non-renewal of a fixed-term contract, no longer using a supply teacher engaged directly or supplied by an agency, terminating the placement of a trainee or volunteer, no longer using staff employed by a contractor and resignation and voluntary withdrawal from any of the above. Where a dismissal does not reach the DBS referral threshold, consideration will be given to making a referral to the Teaching Regulation Agency (TRA). Reasons for making such a referral would include: unacceptable professional conduct, conduct that may bring the profession into disrepute, or a conviction, at any time, for a relevant offence. Failure to make a report when required constitutes an offence, Compromise agreements cannot be used to prevent a referral being made to the DBS when it is legally required, nor can an individual’s refusal to cooperate with an investigation.

7.1.4 The DSL is responsible for ensuring that all members of staff are recruited following the procedures defined in Part 3 of KCSIE (2021

). This is done in accordance with the School’s Recruitment Policy. The DSL will ensure that the recruitment checks of all employees are retained on the School’s Single Central Register.

7.1.5 Additionally, the DSL will ensure that individuals who are engaged in regulated activity with children, including volunteers and those employed by third parties, undergo the appropriate recruitment checks and are included on the Single Central Register where required.

7.2 Staff training

7.2.1 All members of the teaching and support staff receive safeguarding training as part of their induction. We ensure understanding by asking all staff to complete online training or sign a declaration to the effect that KCSIE has been read and understood.

7.2.2 During your induction:

* + - You will be introduced to the Designated Safeguarding Lead and the Deputy Designated Safeguarding Leads (DDSLs).
		- You will also be trained on our Safeguarding (Child Protection) Policy and procedures; including reading KCSIE Part One and Annex A.
		- You will learn how to receive a disclosure from a pupil and what to do if you are concerned about the behaviour of a colleague.
		- You will also learn about Prevent awareness procedures, online safety for pupils, and the School’s safeguarding response to children who go missing from education.
		- You will be informed about the School’s Whistleblowing Policy, Staff Code of Conduct (which includes acceptable use of IT and staff/pupil relationships) and additional policies relating to safeguarding, including the Pupil Behaviour Policy and the Prevention of Bullying Policy to ensure that you are aware and confident in the use of all procedures relating to safeguarding. Access to all relevant documents will be provided during induction.
		1. Volunteers are provided with safeguarding induction training that includes:
		- The School’s Safeguarding (Child Protection) Policy
		- Part 1 and Annex A of Keeping Children Safe in Education (2020)
		- The identity and contact details of the DSL and DDSLs
		- Brief guidance notes on our expectations of their behaviour around pupils

7.2.4 Contractors or visitors to the School receive, as a minimum, the identity and contact details of the DSL and guidance on what to do if they are concerned about a child or a safeguarding practice at the School.

7.2.5 The DSL will provide an annual update to all teaching staff at the beginning of each Autumn Term; any other necessary updates for all staff will take place during the course of the year as required.

7.2.6 Compulsory safeguarding refresher training for all staff will take place on a three-yearly basis or more frequently if required by the School’s Local Safeguarding Partners. The DSL and Deputy DSLs will attend suitable training in child protection and multi-agency working every two years. All training records are held by the DSL, and **staff will be notified when** **their training is due to expire and the date of their next training session.**

7.2.7 The Governor with specific responsibility for safeguarding, will also undergo additional child protection training and updates; this will involve refresher training every two years.

7.2.8 You are required to pay attention to safeguarding issues in all areas of School life, for instance but by no means exclusively, risk assessments for trips, the checks required for the recruitment of staff and volunteers (even if they are to be supervised), organisation of external events and so on. You will receive full training if you are involved in any of the above.

7.2.9 You will regularly be given guidance to ensure that your behaviour and actions do not place pupils, or indeed yourself, at risk of harm or of allegations of harm to a pupil particularly in situations where you are alone with pupils providing one-to-one tuition or assistance. This guidance may come in the form of Safeguarding Bulletins, email updates or department meetings. In particular, the Staff Code of Conduct provides in depth advice for staff relating to appropriate levels of behaviour. This will be discussed during the induction training and periodically thereafter.

7.2.10 Any concerns about a member of staff’s behaviour towards a pupil or pupils will be dealt with under the School’s Staff Disciplinary Procedure, having particular regard to expert advice on child protection issues involving staff and to our legal obligation to report any possible offences.

7.2.11 You will receive regular training and briefings to ensure that you have the skills, knowledge and understanding necessary to keep safe any pupil looked after, or previously looked after, by a local authority.

7.2.12 All staff are trained on how to manage and report a disclosure along with specific guidance relating to managing a report of child on child sexual violence or sexual harassment.

7.3 Staff and the Management of Safeguarding

7.3.1 The Staff Code of Conduct can be found in the Staff Handbook. The aim of the Staff Code of Conduct is to provide clear guidance concerning your actions and conduct in order to ensure pupils or staff are not at risk of harm, or of allegation of harm to a pupil. It sets out the behaviour we expect from all members of staff, and offers specific guidance for staff in boarding houses, delivering tutorials or in one-to-one situations where they may be vulnerable to malicious accusations or for misunderstandings to occur. It also explains the major policies that you must comply with and where to find them.

7.4 Responsibilities of staff members

You must maintain an attitude of **‘it could happen here’** where safeguarding is concerned. When concerned about the welfare of a pupil, you should always act in the best interests of the pupil. We all have responsibility for ensuring the welfare of the pupils, and you must always appropriately share any concerns that you may have about a pupil.

7.5 Responsibilities of the Designated Safeguarding Lead (DSL)

7.5.1 **The Role of the Designated Safeguarding Lead**

The DSL is a member of the Senior Management Team and is given authority, resources and time in order to fulfil the role. The DSL carries ultimate responsibility for safeguarding and Child Protection, as well as online safety.

 **Raise awareness across the School:**

* Ensure that all staff and the Headmaster (teaching and non-teaching, part time, temporary, volunteer), parents and Governors know who the DSL is and what their responsibilities are.
* Brief all School staff and the Headmaster (teaching and non-teaching, part time, temporary, volunteer) on the relevant contents of the guidance and procedures they must follow as specified in this document – including the briefing of new staff and Governors as part of their induction at the School.
* Ensure that all staff and the Headmaster (teaching and non-teaching, part time, temporary, volunteer) understand their responsibilities in being alert to and acting appropriately in cases of or suspected cases of abuse.
* Ensure that the Headmaster is kept informed of any concerns.
* Act as a source of support and expertise to the School community.
* Review and update the policy annually and when new legislation is issued.
* Make this policy available to staff, volunteers and parents and ensure it is posted on the School website.

**Coordinate, deliver, record and assess training:**

* Keep a record of all staff training: safeguarding INSET, annual updates, training in response to changes to local and national guidance, or changes in policy
* Ensure that all staff have read and understood KCSIE (Part 1 and Annex A) January 2021 either directly from the DSL or through external training providers.
* Deliver support staff and Governors’ Induction and statutory training
* Provide statutory training for all staff and the Headmaster (teaching and nonteaching, part time, temporary, volunteer) and Governors every three years.
* Receive appropriate training in line with advice from the local three safeguarding partners every two years, or when new legislation is introduced, and ensuring that this training is disseminated to all others in the School in line with statutory requirements.
* Ensure the Deputy DSLs have Working Together and Child Protection training every two years
* Assess staff training needs regularly through testing staff understanding of policy in practice.
* Liaise with staff (especially pastoral support staff, matron, IT and other technicians and SENDCOs) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies.

**Online Safety**:

* Safeguarding includes online safety and the DSL and Deputies must ensure that they are trained adequately to be able to advise and guide School staff and policy in this area.

**SEND:**

* Safeguarding includes SEND and the DSL and Deputies must ensure that they are trained adequately to be able to advise and guide School staff and policy in this area.

**Keeping up to date on new local and national guidance and regulations:**

* Hold relevant documentation and guidance including the School’s copy of “Working Together: a guide to arrangements for multi-agency co-operation for the protection of children from abuse” and KCSIE, January 2021.
* Develop and maintain effective links with external agencies.

**Work with Governors:**

* Attend a termly meeting with Safeguarding Governor preceding the Governors’ meeting to provide information for Governor review.
* Attend the three annual Safeguarding subcommittee meetings.
* Ensure that the Governing Body undertakes an annual review of the School’s child protection policies and procedures and of the efficiency with which the related duties have been discharged.
* Provide an annual safeguarding report to the Governors which is sent to the Kent safeguarding team within the required timeframe.

**Management of Safeguarding and Child Protection concerns**:

* Develop effective working relationships with other agencies and services and cooperate as required with enquiries of a child protection or safeguarding nature.
* Keep written records of all concerns when noted and reported by staff or when disclosed by a child, ensuring that such records are stored securely and reported onward in accordance with this policy guidance, but kept separately from the child’s general file.
* Decide whether to take further action about specific safeguarding (not child protection) concerns e.g., discuss with Educational Safeguarding Team, Early Help, LADO, talk to parent, find suitable support, use Early Help Assessment (EHA), refer to Child Services.
* Make referrals as appropriate, following guidance on further action.
* Submit reports to and attend child protection conferences
* Coordinate the School’s contribution to child protection plans.
* Inform Early Years and Family Support if a child, who is in receipt of a child protection plan, has unexplained absence of more than 2 days.
* Ensure that when a child with a child protection plan leaves the School, their information is passed to their new school and the child’s social worker is informed.
* To ensure that when a child moves to a new school, in addition to the transference of the child protection file, the DSL should share information proactively with the new school to enable the new school to have support in place when a child arrives and to ensure that key staff, such as the SENCO, are aware of their needs.
* Ensure the School effectively monitors children who have been identified as ‘at risk’
* Provide guidance to parents, children and staff about obtaining suitable help.
* Attend multi-agency briefings.
* Follow guidance on reporting and tracking lost/missing children and removing children from the admission register.
* Ensure safe recruitment practices are always followed and staff/volunteers are selected and recruited following appropriate safe recruitment processes detailed in the Safer Recruitment Policy (appended)
* Review child protection procedures and remedy any weaknesses immediately.
* The DSL should consider the context within which any incidents or behaviours occur. This is known as contextual safeguarding where assessment of children should consider whether wider environmental factors are present in a child’s life that are a threat to their safety or welfare. This is especially likely to be the case with regards to online safety concerns.
* Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff. Their role could include ensuring that the school or college, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children*.*

#### 7.5.2 Role of the Deputy DSL

* Deputise in the absence of the Designated Safeguarding Lead and to be trained in all areas to the same level as the DSL.
* Support and liaise with the Designated Safeguarding Lead in all matters regarding safeguarding and child protection.
* Receive specialist training in line with advice from the local three safeguarding partners every 2 years.

#### 7.5.3 Role of the EYFS DSL

* Liaise with the Designated Safeguarding Lead on all matters regarding safeguarding and child protection.
* Receive specialist training in line with advice from the local three safeguarding partners every 2 years.

####  7.5.4 Role of the Headmaster

* To ensure that the Safeguarding Policy and procedures are implemented and followed by all staff.
* To allocate sufficient time and resources to enable the DSL and deputies to carry out their roles effectively, including the assessment of children and attendance at strategy discussions and other necessary meetings.
* To ensure that staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the School’s Whistleblowing Policy.
* Ensure that the children’s safety and welfare is addressed through the curriculum.

7.6 Data Protection and GDPR

7.6.1 The Data Protection Act (2018) and GDPR does not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

1. **Governance Arrangements for Safeguarding**

8.1 The Role of the Safeguarding Governor:

* To oversee the Schools’ Safeguarding Policy and practice and ensure that the Policy is reviewed annually and signed by the Chairman of the Governors
* To ensure that an annual report, compiled by the DSL is made to the Governing Body and then send to the Kent Education Safeguarding Team.
* To chair the Safeguarding and Pastoral Care Committee, which will review safeguarding and child protection every term and on request in between times.
* To assess the efficiency with which the related duties have been discharged.
* To ensure that any deficiencies or weakness in safeguarding are remedied without delay.
* To monitor systems of online security.
* To determine whether there are any improvements to be made to a school’s procedures or practice following a substantiated allegation against a member of staff.
* To ensure that the DSL should have regular reviews of her own practice and provide opportunities to discuss any concerns about welfare and safeguarding matters.

**Appendix A: Disclosure Form**

## School Crest.jpg“The Green Form”

Saint Ronan’s School

# SAFEGUARDING INCIDENT / CONCERN FORM

|  |  |
| --- | --- |
| **Pupil/Child name** | **Date of birth and Year Group/Class** |
| **Name and position of person completing form (please print)** |
| **Date of incident /concern: (DD MM YY)** |  |
| **Incident / concern (who what where when)\**** *Use initials for other children/young people involved unless there is a specific need to name them in full*
* *Contemporaneous notes or e mails may be attached to this form.*
 |
| **Any other relevant information (witnesses, immediate action taken)\*** |
| **Signature: (name of member of staff)****Role:** | **Date form completed (DD MM YY):** |
| **Action taken (including reasons for decisions) and Outcomes\*** **(NB – this section is only to be completed by DSL)** |
| **Advice sought:****From whom and what advice was given** |
| **Concern/referral discussed with parent/carer?****If not state reasons why. If yes, note discussion with the parent.**  |
| **Feedback to referring member of staff:** |
| **Going forward. Recommended action.**  |
| **Signature of DSL** | **Date (DD MM YY)** |

\*Continue on a separate sheet if necessary

**Appendix B: Signs of Abuse**

**Possible signs of abuse**

The following lists are neither definitive nor exhaustive. The information has to be used in context with a range of other information related to a child’s circumstances. Any concern even if there is no clear indicator must be reported to the DSL.

####  Physical Abuse

* Unexplained injuries or burns, particularly if they are recurrent
* Improbable excuses given to explain injuries
* Refusal to discuss injuries
* Untreated injuries or delay in reporting them
* Excessive physical punishment
* Arms and legs kept covered in hot weather
* Fear of returning home
* Aggression towards others
* Running away

When considering the possibility of non-accidental injuries, remember that injuries may have occurred for other reasons e.g. genuine accidents or medical disorders.

#### Physical Neglect

* Constant hunger
* Poor personal hygiene
* Constant tiredness
* Poor state of clothing
* Frequent lateness, or unexplained non-attendance at school
* Untreated medical problems
* Low self-esteem
* Poor peer relationships
* Stealing

#### Emotional Abuse

* Low self-esteem
* Continual self-deprecation
* Sudden speech disorder
* Significant decline in concentration
* Socio-emotional immaturity
* “Neurotic” behaviour (e.g. rocking, head banging)
* Self-mutilation
* Compulsive stealing
* Extremes of passivity or aggression
* Running away
* Indiscriminate friendliness

#### Sexual Abuse

Not all children are able to tell, or are believed by, parents. Changes in behaviour may be a signal that something has happened. It is important to remember that there may well be no physical or behavioural signs. The following indicators may show that a child is troubled, but not through sexual abuse. The child may have some of these signs or none at all. It is a combination, frequency and duration of signs that can alert you to a problem.

**Behavioural:**

* Lack of trust in adults, or overfamiliarity with adults
* Fear of a particular individual
* Social isolation – withdrawal or introversion
* Sleep disturbance (nightmares, irrational fears, bed wetting, fear of sleeping alone,
* needing a nightlight)
* Running away
* Reluctance or refusal to participate in physical activity or to change clothes for
* activities
* Low self-esteem
* Drug, alcohol or solvent abuse
* Display of sexual knowledge beyond their years SEE NSPCC [TRAFFIC](https://www.brook.org.uk/training/wider-professional-training/sexual-behaviours-traffic-light-tool/#:~:text=Brook's%20nationally%20recognised%20Sexual%20Behaviours,sexual%20behaviours%20in%20young%20people.) LIGHT SYSTEM
* Unusual interest in the genitals of adults, children or animals
* Expressing affection in an inappropriate way
* Fear of bathrooms, showers, closed doors
* Abnormal, sexualised drawing
* Fear of medical examinations
* Developmental regression
* Poor peer relations
* Over-sexualised behaviour/sexual promiscuity
* Stealing
* Psychosomatic factors e.g. recurrent abdominal pains or headache

**Physical:**

* Sleeplessness, fear of the dark, nightmares
* Bruises, scratches, bite marks to the thighs or genital area
* Itch, soreness, discharge, unexplained bleeding from the rectum, vagina or penis
* Pain on passing urine or recurrent urinary infection
* Stained underwear
* Unusual genital odour
* Anxiety, depression
* Eating disorder e.g. anorexia or bulimia
* Discomfort/difficulty in walking/sitting
* Venereal disease
* Soiling or wetting in children who have been trained
* Self-mutilation/suicide attempts

**Sexual Exploitation:**

* Unexplained gifts or new possessions
* Associating with other young people involved in exploitation
* Older boyfriends or girlfriends
* Change in emotional well-being
* Misuse of drugs or alcohol
* Self-harm
* Missing for periods of time or regularly home late
* Sexually transmitted diseases or pregnancy

You may find it useful to refer to the Department for Education’s guidance *What to do if you’re worried a child* *is being abused* (March 2015).

**Appendix C: Keeping Children Safe in Education**

It is a condition of employment that you read and understand Part 1 and Annex A of the government document *Keeping Children Safe in Education* (2020). The document may be accessed [here](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/912593/Keeping_children_safe_in_education_part_1_Sep_2020.pdf).

**Appendix D: Staff Code of Conduct** *see section 2 of the Staff Handbook. Hard copy supplied at Induction.*

**Appendix E: Whistleblowing Policy** *see Policy 2.29 of the Staff Handbook. Hard copy supplied at Induction.*

**Appendix F: Action if a Child is Missing** *see Policy 6.3.1 of the Staff Handbook. Hard copy supplied at Induction.*

**Appendix G: Policy on the use of Force to control of restrain pupils** *see section 3 of the Staff Handbook. Hard copy supplied at Induction.*

**Appendix H: Mobile Phone Policy** *see section 2 of the Staff Handbook. Hard copy supplied at Induction.*

**Appendix I: Safer Recruitment Policy** *see section 3 of the Staff Handbook.*

**Appendix J: Behaviour Policy** *see section 3 of the Staff Handbook.*

**Appendix K: Anti bullying Policy** *see section 3 of the Staff Handbook.*

**Appendix L: Positive Mental Health Policy** *see section 3 of the Staff Handbook.*