BRADFIELD COLLEGE

Safeguarding and Child Protection Policy

V3.6 09.23

Safeguarding Mission Statement

Bradfield College is committed to providing a caring, friendly and safe environment for all its pupils so they can learn in a relaxed and secure atmosphere.

The College takes seriously its responsibility to protect and safeguard its pupils.

Ours is a TALKING school. This means that anyone who has worries about a pupil in the College ought to talk about it.

Telling is not "dobbing in" or "grassing".

And when anyone talks, we listen.

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1 Introduction

1.1 Bradfield places safeguarding at the top of its list of priorities and understands the need for a whole school child-centred approach to safeguarding: all systems, processes and policies are designed and operate with the best interests of our pupils at their heart. The College will ensure that all staff are aware of the safeguarding issues and potential for child-on-child abuse within the boarding environment of the College. All Bradfield employees, volunteers and contractors' employees are required to be aware of the signs of abuse and neglect, so they are able to identify pupils in need of help or protection and are trained so they then take appropriate action. This policy document sets out the actions that MUST be followed if there is any suspicion that a child is at risk of abuse, recognising that the term 'child' includes all pupils in the College. Employees are warned that wealth and privilege offer no guarantees that a child is safe and are reminded that all who work with children should be consistently open to the reality that any child, from any background, could be subject to actual or potential abuse including online. As it says on the Blue CP Card: "It could happen here."

1.2 The College pays particular attention to the guidance provided and inter-agency procedures stipulated by thelocal children's services of and their designated officers. The three LSCBs of Reading, Wokingham and West Berkshire have worked closely together for many years, with a shared Independent Chair and a number of shared sub-groups. These three LSCBs have come together to create the Berkshire West Safeguarding Children Partnership: details may be seen athttps://www.berkshirewestccg.nhs.uk/MASA; andBerkshire West Safeguarding Children Partnership

1.3 The Council of Governors takes seriously its responsibility under section 157 of the Education Act 2002 tosafeguard and promote the welfare of children; and to work together with other agencies to ensure adequatearrangements within our school to identify, assess, and support those children who are suffering harm.
On appointment, all employees, volunteers and contractors' employees are given a copy of the "Blue Card" identifying the DSL and her team, subsequently referred to as the designated Safeguarding Team (DST). They are also given this policy and a copy of the most recent edition of Part One (or, if judged relevant to their role, the condensed version in Annex A) of *Keeping Children Safe in Education (KCSIE)* and asked to confirm that they have read and understood the relevant parts of the document.

1.4 The Staff Code of Conduct is given out at the same time and makes clear what is expected in employees' and volunteers' behaviour whilst working with children. The College's Whistleblowing Policy is discussed, along with the pupil Behaviour Policy; appropriate relationships between staff and pupils (including relationships on-line and on social media) are also mentioned. All these documents are discussed face-to-face with new appointees, in their induction meeting with one of the DSL's safeguarding team, who also explains the College's protocols for dealing with child-on-child abuse, sexual violence and sexual harassment, and any incidents where a pupil is missing from College and explains the possible further safeguarding implications of repeated absence from College. Safeguarding and promoting the welfare of children is defined in KCSIE as 'protecting children from maltreatment; preventing impairment of children's 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.' Theseare the fundamental principles to which the College adheres.

1.5 In circumstances where an employee or volunteer develops any concern that a child may be at risk of harm, they will report this to the DSL. They will do this even if the level of concern is only mild and will make the report promptly, as soon as the concern develops. It is for the DSL to determine the significance of any such concern and the responsibility of College staff is simply to report all such concerns without inhibition.

1.6 If, following a report of concern, a child is identified as "at pastoral risk", by the DSL, an entry will bemade on the Pastoral Tracking file for that pupil, and recorded on the Safeguarding Concerns Register
maintained in the DSL's Office. This register is reviewed on a regular basis at least once every term. The DSLmay determine that specific enhanced pastoral support for the child is required and agree an appropriate Welfare Plan with the pupil's HsM and the wider pastoral team.

Although everyone within the College community who comes into contact with children and their families has an important role to play in safeguarding and providing a safe environment in which pupils can learn, there are several key members of staff who play an important role as the College's safeguarding team, and their contact details are available in the table in section 3 of this document.

1.7 The designated safeguarding leader (DSL) and the Deputies (DDSLs) are most likely to have a complete safeguarding picture and are the most appropriate person to advise on the response to safeguarding concerns. However, anyone may refer a safeguarding issue to the local authority or the Police.

1.8 We recognise that all adults working or visiting the College, including temporary staff, volunteers, and governors, have a full and active part to play in protecting our pupils from harm, and that the child's welfare is our paramount concern.

1.9 The College has due regard to the safeguarding requirements of the revised [National Minimum Standards for Boarding (September 2022)](#) and to the recommendations of the Independent Inquiry into Child Sex Abuse ([IICSA](#)) (March 2022).

IICSA noted that sexual abuse can and does occur

· in all types of schools;

· to all ages of children.

And so it recommended that schools must go beyond the acceptance that 'it could happen here' to the belief that 'it probably is happening here'.

The boarding environment is regarded by IICSA as a high risk for grooming and abuse by adults working at the school as well as providing opportunities for child-on-child sex abuse. Day pupils at boarding schools are also judged to be vulnerable to these risks. Overseas boarders may be especially vulnerable not just at school but when staying with their educational guardians for whom there is no convincing system of checks. The current statutory guidance and independent school standards are judged to be inadequate in these regards.

The Inquiry maintained that there is no simple general solution to the problem of child sexual abuse (CSA) in schools. Instead a series of incremental changes are proposed most of which require government action. However, several specific actions for individual schools are recommended, **which the College fully embraces**: accordingly we shall continue to:

1. report any allegation of child sexual abuse to the inspectorate as well as to the DBS and TRA;

2. ensure that the Head, DSL, and members of the DST are trained to the highest level;

3. ensure that RSE for all pupils including those with SEND is as effective as possible; and

4. ensure that pre-appointment checks and supervision of volunteers are as effective as possible.

We support and embrace the key substantive changes made to the National Minimum Standards for Boarding which we believe are already a central part of our approach to boarding:

1. the focus upon good rather than suitable or adequate provision (e.g. accommodation, facilities, food); how inspectors will decide between 'good' and suitable/adequate' is yet to be seen;

2. the central importance of the welfare and wellbeing of boarders;

3. the need to ensure that our policies reflect the interests and needs of boarders;

4. the need to monitor any lodgings, host families and guardians rigorously.

The College shall carry out an annual audit of boarding which shall be submitted to the Governors: boarding pupils will be invited to provide feedback to Governors on the experiences of boarding especially as it relates to their welfare and wellbeing.

Accordingly, the following guidelines amongst others will be followed:

· The **wellbeing of boarders** will be a primary concern.

· The risks associated with the **potential impact of sexual violence and sexual harassment** in the boarding environment will be considered.

- Any incidents of sexual harassment and sexual violence within the boarding environment will be **recorded as boarding incidents**. A boarding incident would be any kind of sexual harassment or sexual violence either in a boarding house or involving boarding students even when not actually at College and would be recorded as such.

- Staff and boarders of all kinds and needs should know **what to do in an emergency including at night**.

- We shall ensure that there are **clear arrangements for arrival at and departure** from school.

- We shall ensure that **boarders know how to raise concerns** and staff must know how to respond when this happens. Pastoral staff will work together, and with pupils, to identify those who would benefit from the support of an advocate with regards to supporting their wellbeing and raising concerns.

- **Our behaviour and bullying policies** reference behaviour and bullying in boarding accommodation.

- Any incidents of bullying or misconduct within the boarding environment are **recorded as boarding incidents**.

- In accordance with our **RSE policy** we promote good relationships amongst boarders.

- We take appropriate steps to ensure that **guardians are suitable and promote the welfare of boarders**.

- We do not appoint school staff as educational guardians for boarders.

1.10   The College follows (as appropriate to its work as a day and boarding school) national non-statutory guidelines relating to COVID-19 and remote learning: see Appendix A. This will be in place until the Government declares that all COVID related guidance to schools and the wider public is no longer needed.

1.11   Key documents and websites which provide the background to this

policy:Keeping Children Safe in Education 1st September 2023:

1.12   https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1161273/Keeping_children_safe_in_education_2023_-_statutory_guidance_for_schools_and_colleges.pdf

Condensed version of KCSIE for staff who do not have direct contact with pupils: **see Annex A pg 136- 140**

Sexual Violence and Sexual Harassment September 2021

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/999239

/SVSH_2021.pdf

Working Together July 2018, updated December 2020
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/942454 / Working_together_to_safeguard_children_inter_agency_guidance.pdf

Prevent Duty April 2021

https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for- england-and-wales

Contextual Safeguarding

https://contextualsafeguarding.org.uk

Mental Health and Behaviour in Schools, November 2018

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/755135

/Mental_health_and_behaviour_in_schools_.pdf

Preventing and Tackling Bullying, July 2017

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/623895
/Preventing_and_tackling_bullying_advice.pdf

The National Minimum standards for Boarding Schools (September 2022)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1102344/National_minimum_standards_for_boarding_schools.pdf

1.13   Definitions:

- **Safeguarding:** Promoting the welfare of children refers to the process of protecting children from maltreatment, abuse including child-on-child abuse, sexual violence and sexual harassment, preventing the impairment of health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care, promoting mental and physical health and development, and taking action to enable all children to have the best outcomes.

- **Child Protection**: Refers to the processes undertaken to protect children who have been identified as suffering or being at risk of suffering significant harm.

- **Staff**: Refers to all those adults working for or on behalf of the College, full time or part time, temporary or permanent including supply staff, in either a paid or voluntary capacity including governors and contractors.

- **Child**: Includes everyone under the age of 18 and any vulnerable adult aged 18 and over.

- **Parent**: Refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers, guardians and adoptive parents.

2   Summary Guidance and Code of Conduct

2.1   **Disclosures:** If a child discloses to you actual or possible abuse including online by an adult who is not a member of staff or another child:

- Report this immediately to the DSL or in her absence a DDSL.
- Make a clear record of what the child has said to you and give this to the DSL or DDSL.
- Do not ask leading questions and do not promise confidentiality to the child.
- Ensure that the child is safe.
- Take the child to the College Medical Centre if appropriate.
- Do tell the child that you must speak to the DSL or a DDSL.
- Be guided by the DSL or DDSL as to what you should do next: do not investigate yourself
- Do not discuss the issue with colleagues, friends, family or anyone else unless otherwise directed by the DSL or DDSL
- Be aware that should the need arise you may directly contact local children's services and/or the Police directly.

2.2   **Child-on-child abuse including sexual harassment or sexual violence:** If a child discloses to you:

- Report this immediately to the DSL or in her absence a DDSL.
- Make a clear record of what the child has said to you or of the information given to you.
- Be guided by the DSL or DDSL as to what you should do next: do not investigate yourself.
- Follow the steps for disclosures above, noting that the pupil should be taken seriously kept safe and not be made to feel that they are creating a problem for reporting abuse.
- Remember that at Bradfield there is zero tolerance of child-on-child abuse including harassment of all kinds and bullying including cyber-bullying and all kinds of online abuse.
- The threshold for any instance of bullying, cyber-bullying harassment or child-on-child abuse to be regarded as a child protection matter is whether or not there is actual significant harm or the risk of significant harm.
- If unsure, guidance must be sought from the DSL/DDSL: follow the golden rule: if in any doubt, report.
- Where there is any uncertainty about whether or not an incident reaches the threshold of harm as a child

  protection matter, guidance will be sought from the local children's services.
- Sanctions logs and records of child-on-child abuse will include references to any unacceptable sexual conduct including in any intimate relationships between pupils.

2.3   **if you just suspect abuse but there is no disclosure:**

- Report your suspicion immediately to the DSL or in her absence a DDSL.

2.4   **Allegations against staff, including volunteers, contractors and supply staff, other than the Headmaster:** if you wish to make an allegation about conduct however low-level:

- Report an allegation immediately to the Headmaster or in his absence the Warden without informing the person against whom the allegation has been made.
- Ensure that any child involved is safe.
- Do not discuss the issue with colleagues, friends, pupils, family or anyone else unless otherwise directed by the Headmaster
- Be aware that you may directly contact local children's services and/or the Police directly.

2.5   **Allegations against the Headmaster:** if you wish to make an allegation:

- Report this immediately to the Warden or in their absence the Deputy Warden without informing the Headmaster.
- Ensure that any child involved is safe.
- Do not discuss the issue with colleagues, friends, pupils, family or anyone else unless otherwise

directed by the Warden.

- Be aware that you may directly contact local children's services and/or the Police directly.

2.6 **Allegations: niggling doubts and low-level concerns**

('sixth sense', cognitive dissonance where something doesn't seem quite right):

If you have a niggling doubt about any situation involving staff, report this immediately to the Headmaster or if it concerns the Headmaster to the Warden, without informing the person regarding whom you have a niggling doubt or any other person. Any such report will be recorded with a note of the record being held by the designated safeguarding governor and if there is any doubt about the seriousness of the doubt, the Headmaster or Warden as appropriate will seek the advice of the local authority in making this decision.

2.7 **Duty of care:** all staff and volunteers must take reasonable care of pupils under their supervision,protecting them from harm and seeking to promote and safeguard their welfare.

2.8 **Professional Conduct:** everyone should always consider whether their words and actions are warranted, proportionate, safe and applied equitably:
- all pupils must be treated the same – favouritism of any sort is unacceptable

- be aware of pupils' emotional needs – personal comments, sarcasm, embarrassing or humiliating words are always unprofessional

- be aware that some pupils may find it hard to tell someone that they are being abused: they may not be ready to do so or they may not know how to do so

- avoid language that is sexual, sexist or racist in tone or talk that is discriminatory or intimidating innature

- avoid inappropriate conversation, including innuendo, salacious gossip or swearing

- never behave in a way that demeans or undermines a pupil, his/her parents, carers, friends or relatives

- particular care should be taken by those teaching on a one-to-one basis, by boarding staff, by those involvedin the personal care of children, and by those who may come into physical contact in the course of educational demonstrations with pupils;

- should the need for reasonable restraint arise, this should be reported immediately to the Headmaster.

2.9 **Personal integrity:** recall that employees and volunteers occupy a professional "position of trust" and so, by law, must not attempt to cultivate any sort of sexual relationship with a pupil
- avoid behaviour and conversation that might cause a reasonable adult to question your suitability to workwith other people's children;

- avoid dressing in a way that might be construed as sexually provocative;

- never behave in a way that might be thought of as showing favouritism to individual children, for example giving birthday cards, treats or small gifts (except in circumstances covered by the College'spolicy on rewards – outlined in the Behaviour Policy);

- staff and volunteers should talk immediately to their line manager (or the Second Master) if they sensea possibility their demeanour, words or actions might have been misconstrued.

2.10 **Social contact:** nobody should arrange to contact or meet pupils outside the school setting except forreasons associated with work at the College and agreed in advance by managers:
- at College or when on College business (e.g. trips and visits), never meet pupils one-to-one behind aclosed door;

- never cover the glass panels in classroom doors, or close curtains or blinds when meeting pupils inCollege;

- be aware of pupils' personal space – physical contact is wholly inappropriate, except in very limitedcircumstances (when a necessary part of the employee's professional duties);

- never smoke or take drugs in the presence of pupils: only drink alcohol when pupils are present if theoccasion is licensed by the Second Master;

- staff and volunteers should never take pupils on a journey in their car – except in circumstancescovered by the College's policy on Educational Visits.

2.11 **Treatment of pupils:** everyone should value and respect pupils as individuals, behaving towards them in asafe, fair, mature and considered manner:

- never seek personal friendship with pupils;

- build relationships with pupils that have a professional character – treat all pupils equally;

- never make unprofessional remarks about pupils' appearance and dress, or make comments touching on
  physique or bodyimage;

- avoid trivialising the significance of smoking, alcohol and drug abuse;

- never make inappropriate attempts at humour touching on anxiety and depression, self-harm;

- staff and volunteers should avoid discussing their intimate personal relationships in conversation withpupils.

2.12 **Behaviour online:** nobody should ever exchange personal contact details (address, e-mail, details, telephonenumber) with a pupil at the College:

- never use social networking sites to have personal contact with pupils at the College;

- never take photographs of a pupil without seeking their permission and that of the HsM to do so andbeing explicit about the intended use of the photograph;

- never store photographs of pupils on the memory of any personal device;

- take special care when posting personal photographs on sites like Facebook – think of such sites asplaces where images are on publicdisplay;

- Staff should be aware of the need to ensure that the College remains free from the dangers of online e-security threats and therefore should comply with the College's protocols relating to downloading files and following links provided when online including in emails and other communications.

2.13 **Monitoring and filtering:**

Staff should be aware that students are at risk when online. Hence they should be familiar with the College's approach to and policies regarding online safety including:

- the need for the College to provide effective filtering and monitoring of the access to the Internet;

- the expectations, applicable roles and responsibilities in relation to filtering and monitoring;

- in particular they should be aware that the DSL has the lead responsibility for online safety

- understanding the risks associated with online safety in general and Prevent in particular, with those related to the latter being set out in the College's risk assessment for Prevent.

2.14 **Confidentiality:** no employee or volunteer should ever promise to keep confidential or secret somethingtold them by a pupil.

3   Contacts

3.1   Within College:

- **Designated Safeguarding Lead: Sarah Davies (mobile 07919 036 610)**

- **Deputy DSLs (DDSLs)**   **Richard Penny (mobile 07553 676199)**

                                     Charlotte van der Westhuizen (mobile 07920 862727)

Should illness, requirement to isolate, or any other issue affect the entire DSL team's ability to respond, then contact should be made with the local authority directly or with the most senior member of the senior leadership team available who will liaise with the local authority directly.

3.2   Council of Governors Contacts

- **Nominated governor for child protection and safeguarding: Catherine Hartz**

  cpgovernor@bradfieldcollege.org.uk

- **The Warden** (to whom safeguarding allegations against the Headmaster must be referred withoutinforming the Headmaster): **Tom Beardmore-Gray**
  tbeardmoregray@bradfieldcollege.org.uk
  or in his absence the **Deputy Warden – Ian Wood-Smith**
  imwoodsmith@bradfieldcollege.org.uk

3.3   Local Authority Contacts

- **Berkshire West Local Safeguarding Partnerships Procedures**

  Telephone 01635 519 982

  https://www.berkshirewestccg.nhs.uk/media/2740/bwscp-multi- agency-safeguarding-arrangementsv3.pdf and

  https://www.westberkslscb.org.uk/ and https://www.westberkslscb.org.uk/homepage/guida

  The procedures in this policy apply to all staff and governors and are consistent with locally agreedinter-agency procedures of Berkshire West Safeguarding Children Partnership.

- **Children's Social Services at West Berkshire Council, West Street House, West Street, Newbury RG14 1BD:**

  Contact, Advice and Assessment Team (CAAS) 01635 503 090 or email:

  child@westberks.gov.uk

  For immediate concerns about the child's safety the police will be contacted by the DSL (Emergency999, or Non-Emergency 101). EDT contact details for out of hours children's services in West Berkshire are 01344 786 543 edt@bracknell.forest.gov.uk

- **Designated Officer for the LA: Fiona Goussard**

  Telephone 01635 503 090 or 01635 503 153 cpadmin@westberks.gov.uk

- **West Berkshire Building Communities Together Team Manager**

  Susan Powell Susan.Powell@westberks.gov.uk

3.4   Police

- Police (Immediate Risk including Prevent)   999
- Police (Non-Emergency including Prevent)   101
  https://www.thamesvalley.police.uk/ro/report/ocr/af/how-to-report-a-crime/

3.5   Other Contacts

- **Children's Commissioner England** Telephone 020 7783 8330help.team@childrenscommissioner.gsi.gov.uk

- **Child and Adolescent Mental Health Service - CAMHS**

  Telephone 01635 295 555
  http://fis.westberks.gov.uk/kb5/westberkshire/fsd/home.page

- **DoE Preventing extremism in schools and children's services**

  Telephone 020 7340 7264 counter.extremism@education.gov.uk

- **NSPCC**

  Telephone 0808 800 5000help@nspcc.org.uk

- **NSPCC helpline**

  For reporting peer on peer abuse in educational settings

  Telephone **0800 136 663**

  help@nspcc.org.uk

- **NSPCC Whistleblowing Advice Line**

  Telephone 0800 028 0285

- **ChildLine**

  Telephone 0800 1111

- **CEOP (Child Exploitation and Online Protection)**   Telephone 0370 496 7622
  (available 24/7) communication@nca.gov.uk

- **Kooth – Online Mental Wellbeing Community www.kooth.com**

3.6   If there is a **risk of immediate harm to a child**, staff should act immediately.

3.7   **Anyone may make a referral to children's services or the police.** Depending on the situation, they shouldcall the Local Safeguarding Partnership (LSP) number above or in an emergency call 999 straight away and/or contact the DSL who may call other relevant agencies, such as children's services.

3.8   Where appropriate, and only after speaking to the LSP, the DSL will inform parents of thiscontact/referral: staff should **never** do this themselves.

3.9   At least one member of the Designated Safeguarding Team (DST) of DSL and the DDSLs should alwaysbe available to discuss safeguarding concerns. If the DST is absent for any reason, contact details of alternative support will be given to all staff via email.

3.10   **Staff should not assume that another colleague or professional will take action.**

3.11   **Whistleblowing:** staff may use the College's whistleblowing policy to draw attention in good faith to any

   perceived failing with regard to safeguarding practice either in individual cases or concerning more general circumstances.

   Staff should not use the whistleblowing policy with regard to any allegation against a colleague orthe Headmaster: in such cases they must follow the guidance in this policy: see summary guidance in Section 2 above and allegations in Section 11 below.

3.12   **Inspectorates:** Anyone may contact Ofsted or the Independent Schools Inspectorate (ISI)should theybelieve the College is not acting suitably with regard to safeguarding:

- Ofsted: 0300 123 466 or email CIE@ofsted.gov.uk ;

- ISI: 0207 600 0100 or email concerns@isi.net

4   Safeguarding Aims

4.1   At Bradfield College we are committed to safeguarding children and young people and we expect everyone who works in our school to share this commitment. Adults in our school take all welfare concernsseriously and encourage children and young people to talk to us about anything that worries them. We willalways act in the best interest of the child.

4.2   To support the child's physical and mental development thereby fostering security, confidence andindependence.

4.3   To provide an environment in which children and young people feel safe, secure, valued and respected,and feel confident, and know how to approach adults if they are in difficulties, believing they will be effectively listened to.

4.4   To provide and promote systems for pupils as well as staff which are easily understood and readily accessibleso that anyone may confidently report abuse knowing that concerns will be treated seriously.

4.5   To raise the awareness of all teaching and non-teaching staff of the need to safeguard children and of theirresponsibilities in identifying and reporting possible cases of abuse including those online; specifically: to ensure that staff know: how to identify the signs of abuse and neglect: how to pass on and record concerns about a pupil; that they have an individual responsibility to be alert to the signs and indicators of abuse including child-on-child abuse and for referring child protection concerns to the DST; that they have a responsibility to provide a safe environment where children can learn.

4.6   To provide a systematic means of monitoring children known or thought to be at risk of harm including when online or in need of early intervention and support, and to ensure that the College contributes to assessments of need and support plans for those children.

4.7   To ensure excellent levels of communication amongst staff on pastoral and on safeguarding matters.

4.8   To develop a structured procedure within the College which will be followed by all members of theCollege community in cases of suspected abuse.

4.9   To develop and promote effective working relationships with other agencies, especially the Police andother appropriate external children's services.

4.10   To ensure that all staff including supply staff and volunteers working within the College who have substantial access to children have been checked prior to their starting dates as to their suitability, including verification of their identity, qualifications, and a DBS check, and a central record is kept foraudit.

4.11   To ensure through a whole-College approach including teaching, training and curriculum planning that allpupils are provided with the guidance they need to keep themselves safe including when online including from harmful online challenges and hoaxes with reference as appropriate to the guidance in:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/811796/Teaching_online_safety_in_school.pdf

https://www.gov.uk/government/publications/harmful-online-challenges-and-online-hoaxes/harmful-online-challenges-and-online-hoaxes

Because online abuse frequently happens when pupils are at home, the College recognises the importance of involving parents in its approach to online safety.

4.12   In order further to promote the welfare and safety of students, to safeguard that the protectedcharacteristics of students under the Equality Act 2010, including:
- disability
- gender reassignment
- race
- religion or belief
- sex

- sexual orientation.

4.13　To ensure that the safeguarding policy is up-to-date, incorporating the most recent DfE and local authorityguidance, and is suitable for its purposes: the policy will be reviewed at least annually by the leadership of the College and following scrutiny by the Council of Governors and any changes required the policy will be published to staff and to parents.

4.14　To recognise the importance of the role of the DST and ensure they have the time, training and supportnecessary to undertake their duties which include, providing advice and support to staff, pupils' onlinesafety, taking part in inter-agency meetings and contributing to the assessment of children in need.

4.15　To maintain confidentiality with regard to safeguarding matters: the Headmaster and DST will disclose information about a child to other members of staff on a need to know basis only.

5 Guiding principles for staff

5.1 Each and every employee of the College, governor and volunteer at the College is under a general moraland professional duty to:

- Ensure that the best interests of the child are paramount.

- Understand that the College provides an environment in which all pupils should feel able to speak freely.

- Seek to understand the child's point of view and wherever possible take it into account.

- Ensure that staff should not assume that somebody else will take action

- Share information that might be critical in keeping children safe.

- Listen to the views of the child, reassessing concerns when situations do not improve, sharinginformation quickly and challenging inaction.

- Understand the need to reassure victims of abuse or alleged abuse that they will be taken seriously,supported and kept safe.

- All staff need to be aware of the safeguarding issues and potential for child-on-child abuse within the boarding environment of the College.

- Recognise signs of abuse including child-on-child abuse and know how to respond effectively.

- Staff should be aware of the need to ensure that students are at risk when online. Hence they should be familiar with the College's approach to and policies regarding online safety including with regard to filtering and monitoring online activity.

- Staff should also be aware of the cyber-risks to the security of the College's computer system and follow the protocols set down to minimise these risks.

- Be aware of the College's child protection procedures and to follow them.

- Know how to access and implement the procedures, independently, if necessary.

- Keep a sufficient record of any significant complaint, conversation or event.

- Report any matters of general concern or any disclosure (other than an allegation against a colleagueor the Headmaster) immediately to the DSL or a deputy DSL.

- Be aware of the procedures to follow when reporting an allegation against a member of staff or again stthe Headmaster.

5.2 Recognise that any child may benefit from early help and interventions, but all College staff should beparticularly alert to the potential need for early help for a child who:

- is disabled, has specific additional needs, or has special educational needs (whether or not they havean education, health and care plan): see section 13 below;

- is a young carer;

- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups; or is frequently missing/goes missing from care or fromhome;

- is misusing drugs or alcohol themselves;

- is at risk of modern slavery, trafficking or exploitation;

- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mentalhealth problems or domestic violence and abuse;

- has returned home to their family from care;

- is showing early signs of abuse and/or neglect

- is at risk of being radicalised or exploited;
- is a privately fostered child.

5.3 We aim to ensure that children receive the right help, at the right time to address risk and prevent issuesescalating. Hence staff should be aware of the local early help process and understand their role in it.

5.4 The College maintains a zero-tolerance policy towards all forms of child-on-child abuse including sexual violence and harassment, and seeks to ensure that no form of any such abuse (no matter how 'low level' itmay appear) is ever dismissed as a joke or banter. Staff will undertake appropriate formal safeguarding and

child protection training which is regularly updated in accordance with KCSIE and local authority guidance, and any lessons learnt from issues which might arise. In addition, all staff members should receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skillsand knowledge to safeguard children effectively. The specific training will include online safety including the dangers of grooming, cyber-bullying and social media, child-on-child abuse, domestic abuse and its impact upon children, radicalisation, and dealing with harmful misbehaviours such as drug-taking, alcohol abuse, and youth produced sexual imagery (YPSI) and sexting.

5.5 Staff will undertake appropriate formal safeguarding and child protection training which is regularly updated in accordance with KCSIE and local authority guidance. In addition, all staff members will receivesafeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

5.6 The specific training will include online safety from a whole-College perspective including the dangers of grooming, cyber-bullying and social media, child-on-child abuse, sexual violence and sexual harassment, radicalisation, and dealing with harmful behaviours such as drug taking, alcohol abuse, and youth-produced sexual imagery/sexting. Staff will be made aware that: safeguarding incidents and/or behaviours canbe associated with factors outside the College and can occur between children outside the school; and that children may be at risk of abuse or exploitation in situations outside their families and be vulnerable to a variety of harms including sexual and criminal exploitation and serious youth violence.

5.7 All staff should also be aware 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 professionalsshould attempt to make a diagnosis of a mental health problem. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, referring the concern to the DSL or a DDSL.

5.8 The College will always consider sharing our intention to refer a child to local children's services with their parents/carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation: if in any doubt whatsoever, the College will consult with the local children's services and/orthe police before sharing the intention with parents/carers.

5.9 There will be occasions when staff may suspect that a pupil may be at risk but have no 'real' evidence. Thepupil's behaviour may have changed, their artwork could be bizarre or troubling, they may write stories or poetry that reveal confusion or distress, or physical but inconclusive signs may have been noticed. In these circumstances, staff will try to give the pupil the opportunity to talk. The signs they have noticed may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill, or an accident has occurred. It is fine for staff to ask the pupil if they are OK or if they can help inany way.

5.10 Staff should use the College's reporting systems to register any concern relating to safeguarding, to recordthese early concerns and then speak with the DSL as soon as possible.

5.11   If the pupil does begin to reveal that they are being harmed, staff should follow the advice below. Following an initial conversation with the pupil, if the member of staff remains concerned however slightly, they should discuss their concerns with the DSL, who will assess the situation and keep the member of staff informed. It is not the end of the member of staff's responsibility when they report it, they should expect feedback and should act if they do not receive satisfactory feedback.

5.12   Any parents who wish to report a safeguarding concern may contact the DSL directly at the College.

5.13   Concerns which do not meet the threshold for child protection intervention will be managed through the pastoral system working with key staff to help address the issue(s): in all cases of any doubt, discussions will be held with the relevant external authorities before proceeding.

6 Training

6.1 Designated safeguarding team (DST):

- Each member of the designated safeguarding team (DST) will receive suitable training updated at least everytwo years in accordance with local authority guidelines and will include guidance with regard to inter-agencypractice and Prevent; the deputy DSLs will be trained to the same level as the DSL.

- Training for the DST will provide them with a good understanding of their own role, and theprocesses, procedures and responsibilities of other agencies, particularly children's social care.

- The DST will also maintain effective liaison with local children's and inter-agency services to ensurethat their understanding of safeguarding practice is up-to-date and sufficiently detailed.

- The DST will have an in-depth understanding of DfE guidance including the most recent editions ofKCSIE in its entirety, Working Together and other statutory or related guidance.

- At least one member of the DST will be responsible for ensuring that the College takes appropriate measures to deal with its Prevent duties in accordance with the most recent anti-extremist guidance and the College's Prevent Duty risk assessment.

- At least one member of the DST will be responsible for ensuring that the College takes appropriate measure to deal with looked after children in accordance with the most recent guidance from the localchildren's services.

- The DST will be responsible for ensuring that suitable safeguarding training is provided for all members of the College community, regularly updated and at least annually. This training will include guidance on the impact of domestic abuse and on child-on-child abuse including sexual violence and sexual harassment, online safety, and on early help and interventions.

- Training for the College community will include informal as well as formal updates and briefingsorally or by email and shall include a clear focus upon the systems used to promote safeguarding

- The DST will be responsible for ensuring that suitable records are maintained for safeguarding training both formal and informal for the DST, staff, governors, and others within the College community.

- At least one member of the DST will be responsible for online safety throughout the College and as such they should receive suitable training to allow them to discharge their responsibilities effectively.

- At least one member of the DST will be responsible for ensuring that the senior leadership and the Council of Governors receive suitable safeguarding training, updated at least annually.

- The DST will ensure that at least one person trained in safer recruitment is a member of eachappointment panel for new members of staff.

6.2 Induction

All members of staff will receive either prior to their starting dates or as soon as possible thereafter suitable safeguarding training which will include:

- Meeting with at least one member of the DST and knowing the identities of the DST

- Reading and having a working understanding of Part 1, Annex B and any other relevant parts of the latest edition of KCSIE, noting that some members of staff who will carry out their duties without regular direct contact with pupils may be asked only to read Annex A, the condensed version of KCSIE.

- Receiving suitable online training as directed by the DST.

- Reading the College's safeguarding policy and having a working understanding of how to manage safeguarding situations including disclosures, child-on-child abuse, child-on-child sexual violence, sexual harassment, and allegations against staff and low-level concerns regarding staff.

- Understanding the College's approach to online safety, including content, contact, conduct and commerce, and the approach to monitoring and filtering online activity.

- Reading and understanding the College's policies and procedures for pupil behaviour, missingchildren, registration and anti-bullying including with regard to prejudice-based and discriminatory bullying and safeguarding matters.

- Reading the College's whistleblowing policy and having a working understanding of how it may beused with regard to safeguarding.

- Guidance on dealing with child-on-child abuse including bullying in all its forms, abuse when online or in receipt of messages and communications via mobile technology, and sexual violence and sexual harassment.

- matters, including guidance on staff/pupil relationships and the use by staff of mobile technology inCollege and of social media.

- Reading and understanding the College's guidance on the acceptable use of IT.

All members of the council of governors will receive either prior to their starting dates or as soon as possible thereafter suitable safeguarding training which will include:

- Meeting with at least one member of the DST.

- Knowing the identities of the DST

- Reading and having a working understanding of at least Part 1 and any other relevant parts to which theymay be directed of the latest edition of KCSIE.

- Reading the College's safeguarding policy.

- Understanding the College's approaches to bullying, to sexual violence and to sexual harassment.

- Understanding the College's approaches to online safety and e-communications and to monitoring and filtering internet activity and also to maintaining secure IT systems minimising cyber threats.

- Reading the College's whistleblowing policy and having a working understanding of how it may be usedwith regard to safeguarding.

- Reading and understanding the College's guidance on the acceptable use of IT.

6.3   Staff

- All members of staff will receive regular updates on safeguarding at least annually, with this including any changes to KCSIE and local authority guidance as well as reinforcement of key points from previous training through staff meetings, all-staff emails, and other appropriate mechanisms.

- All members of staff will be reminded at least annually of their obligations set down within the College's safeguarding policy, guidance on the acceptable use of IT and on online safety, their duties under Prevent, and the staff behaviour code of conduct.

- The College recognises that the role of boarding staff is physically, emotionally and mentally difficult and appropriate training support will be provided for all such staff.

- All members of staff will receive guidance on early help and interventions and will support the pastoraland DST in this area.

- All members of staff will receive guidance on dealing with and reporting child-on-child abuse including bullying in all itsforms, and child-on-child sexual violence and sexual harassment

- All members of staff will receive guidance on the process for making referrals to children's social care.

- Reading and understanding the staff behaviour (code of conduct) with particular regard to safeguarding

- All members of staff will know what to do if a child tells them he/she is being abused, exploited or neglected

- All members of staff will understand the need to reassure victims of abuse or alleged abuse or sexual harassment an sexual violence that they will be taken seriously, supported and kept safe and that no victim need feel ashamed for making a report.

6.4   Contractors and Visitors

- The DST liaising with the HR Department will take a risk-assessed view as to the safeguarding guidance provided for contractors, community users of the College facilities and for visitors to theCollege and as to how this is managed in practice.

6.5 HR Personnel

- The DST will ensure that members of the HR staff are suitably trained to ensure that pre-appointmentand other safeguarding checks are carried out and that records are maintained effectively.

- HR staff will be trained in procedures for dealing with allegations of abuse against staff and volunteersand to make a referral to the DBS as required by law and consider a referral to the Teachers Regulation Agency (TRA) if a person has been dismissed or removed due to safeguarding concerns, orwould have been had they not resigned or otherwise left the College.

- Reading and understanding the staff behaviour (code of conduct) with particular regard to safeguarding.

- Reading, understanding and implementing the relevant sections of the current inspectorate's (ISI) commentary on pre-appointment checks.

6.6 Contractors and Visitors

- The DST liaising with the HR Department will take a risk-assessed view as to the safeguarding guidance provided for contractors, community users of the College facilities and for visitors to theCollege and as to how this is managed in practice.

6.7 Governors

- The DST will ensure that all governors receive suitable and regular safeguarding training which will include reminders of their safeguarding responsibilities as well as updates on KCSIE and other statutory related guidance.

6.8 Pupils

- The DST will ensure that all pupils receive suitable age-related guidance with regard to safeguardingmatters including the action to take should they receive a disclosure or be concerned about another pupil.

- Pupils will be guided through wellbeing lessons, assemblies, and other means so that they feel entirely confident in reporting their concerns about themselves or others to their HsM, to a member of staff, orto a member of the DST team.

- The DST will ensure that all pupils will receive suitable age-related guidance on safeguarding mattersincluding what to do if they feel unsafe.

- The DST will ensure that pupils receive suitable age-related guidance with regard to staying safeonline, to the safe use of social media, to safeguarding, and to relationship and sex education.

- Pupils with responsibilities including within boarding houses have a particular responsibility to be vigilant and to report their concerns: all such pupils will receive appropriate safeguarding training.

- Pupils will receive appropriate guidance through wellbeing classes and other appropriate avenues in linewith DfE recommendations in https://www.gov.uk/guidance/teaching-about-relationships-sex-and- health and the College's approach to relationships, sex, and health education.

6.9 Parents

- The DST will ensure that parents are provided with suitable guidance regarding the College's approach to safeguarding.

- The DST will provide from time to time suitable presentations for parents on safeguarding matters such as online safety.

7 Responsibilities

7.1 Governors

- The governors as a corporate body have ultimate responsibility for safeguarding including saferrecruitment within the College.

- The governors will ensure that employees, volunteers and contractors' employees understand that they should always act in the interests of the child in safeguarding matters and that they cannot offerconfidentiality to a child in any circumstances.

- The governors shall receive and review an annual safeguarding audit from the DST.

- A full review of policy, the past year's safeguarding activity, safer recruitment and safeguarding trainingwill be undertaken by the full board at the Summer Council Meeting and the DSL will attend that meeting to answer questions put by governors.

- The governors will monitor and challenge appropriately the DST and the senior leadership of the College to ensure that the safeguarding policy is effectively implemented, using as appropriate: visits tothe College and boarding houses; discussions with staff and with pupils; staff, pupil and parental questionnaires and surveys; scrutiny of records relating to safeguarding, bullying and behaviour, and early help and interventions.

- A designated member of the Council of Governors will be assigned to liaise on all safeguarding matters with the DST and the leadership of the College and local children's and other services; at least once each term, this designated member of the Council of Governors will meet with the DST as awhole; should there be an allegation against the Headmaster, the Chair of Governors will immediatelycontact the designated officer for the local authority.

- The governors will ensure that the College's safeguarding arrangements take into account the requirements of the West Berkshire Contact, Advice and Assessment Team (CAAS) and that theCollege contributes to inter-agency working in line with the guidance given in *Working Together.*

- The governors will ensure that the College complies with all safeguarding matters relating to theIndependent Schools Standards and Regulations and the revised (2022) National Minimum Standards for Boarding.

- The governors will ensure that they receive suitable and regular safeguarding training from the seniorleadership, DST and external sources.

- The governors will ensure that relevant staff have due regard to the relevant data protection principles which allow them to share or withhold as appropriate personal information, as provided for inthe GDPR and Data Protection Act 2018: practitioners may share safeguarding personal informationwithout consent where this will enhance the safeguarding of a child; where serious harm is possible, again this is a good reason for withholding information. 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. In cases of doubt, legal advice should be sought.

- The governors will ensure that there is an effective approach to online safety and the use of IT, smartand mobile technology, including: the provision of curriculum programmes for pupils and training forstaff; the use of robust filtering and monitoring systems; and minimising that any e-security risks to the College's computer systems.

- The College governing body, the Council, acknowledges that safeguarding duties are the responsibility ofthe entire governing board. A sub-committee of Council, the Pastoral Committee monitors the effectiveness of the College's discharge of its Child Protection responsibilities and arrangements.

- The College Pastoral Committee and the nominated Governor for Child Protection will satisfy themselves that the College's Child Protection and Safeguarding arrangements are current, accord withthe requirements of the Law and represent good standards of practice. They will undertake

termly reviews of safeguarding at Bradfield.

- The Pastoral Committee will directly or where confidentiality is required through the DSL scrutiniserecords relating to safeguarding, bullying and behaviour to ensure consistency and connectivity.

- The Pastoral Committee will ensure that the College most effectively follows the guidance on

  relationships, sex and health education in
  https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/908013/Relationships_Education__Relationships_and_Sex_Education__RSE_and_Health_Education.pdf

7.2   Senior Leadership and Headmaster

- The senior leadership will include the designated safeguarding lead (DSL).

- The senior leadership must monitor and challenge the designated safeguarding team (DST) in an appropriate manner to ensure that it discharges its duties effectively.

- At least once each term, the Headmaster will meet with the DST as a whole.

- The senior leadership shall receive an annual safeguarding audit from the DST.

- The senior leadership shall ensure that all members of the DST are effectively trained and that thistraining is up to date.

- The senior leadership shall ensure that the DSL is supported fully in providing training for all membersof staff including induction training.

- The senior leadership should ensure that the DST and members of staff generally understand and act appropriately with regard to pupils with particular vulnerabilities and sensitivities and needs including boarders, and those with SEND and EAL and those who are looked after or who are being supported bylocal agencies.

- The senior leadership shall ensure that all members of staff understand the need to reassure victims of abuse or alleged abuse that they will be taken seriously, supported and kept safe.

- The senior leadership directly or where confidentiality is required through the DSL will scrutinise recordsrelating to safeguarding, bullying and behaviour.

- The senior leadership shall ensure that appropriate and effective systems are in place to deal with peer-on-peer abuse, bullying in all its forms, sexual violence and sexual harassment.

- Ensure that staff are trained to recognise signs of abuse including child-on-child abuse and know how torespond effectively.

- The HR Director is responsible to the Headmaster for ensuring that the requirements of safer recruitment are implemented.

- The Director of Compliance is responsible to the Headmaster for advising on all safeguardingmatters relating to the relevant Independent Schools Standards and Regulations and National Minimum Standards for Boarding.

7.3   DSL and DST

- The DSL will be responsible to the Headmaster and to the governors for the effective discharge of thesafeguarding responsibilities of the designated safeguarding team (DST); she will liaise with the Headmaster and governors as required and at least on a termly basis.

- The DSL will be a member of the senior leadership of the College.

- The DST will act immediately when it becomes aware of any disclosure or allegation or a child at risk,liaising directly with the three safeguarding partners: the local authority and local children's services; the chief officer of police for the area; and the clinical commissioning group for the area, as guided by *Working Together*. Where the College is named as a relevant agency the DSL will note and abide by the statutory duties required. Mindful that early information sharing is vital; for the

effective identification, assessment and allocation of appropriate provision, the DST will follow the guidance on information sharing set out in the DfE guidance Information Sharing, July 2018: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/fi le/7 21581/Information_sharing_advice_practitioners_safeguarding_services.pdf

- The DST will welcome feedback from pupils and respond to this appropriately.

- Fears related to data protection about sharing information must not be allowed to stand in the way ofthe need to safeguard and protect the welfare of children.

- The DSL will ensure that child protection reports and records: are clear and comprehensive; providedetails of how a concern was followed up and resolved; and includes a note of any action taken, decisions reached and the outcome.

- The DSL is responsible for ensuring that suitable and up-to-date training is provided for themselves, thesenior leadership, governors, staff, HR personnel, pupils, parents, contractors and visitors and that suitable confidential records are kept of this training as set down in above.

- The DST will promote an environment within which the vulnerable children are protected, includingwhen appropriate ensuring that staff are aware of, and are provided with the means to support, the specific needs of particular children; a culture of high aspirations for these children will be maintained.

- The DST will provide guidance and support for staff in all areas relating to safeguarding, including:

  information about and the management of: disclosures of abuse; allegations against staff; reports of extremism, instances of child-on-child abuse, sexual harassment and child sexual violence; examples ofbullying which may be regarded as a safeguarding matter, i.e. when they are sufficiently serious as to cause or threaten significant harm; online safety; the safe use of smart and mobile technology; and children in need of support and early intervention.

- The DSL will ensure that suitable measures are in place to provide pupils with effective education forsafeguarding themselves including when they are online at home or away from College.

- Where remote learning is necessary the College will follow the protocols set out in Appendix A and recommended in https://www.gov.uk/guidance/safeguarding-and-remote-education-during- coronavirus-covid-19; with reference also to https://learning.nspcc.org.uk/news/covid/undertaking-remote-teaching-safely .

- The DSL will liaise with other members of the senior leadership to ensure that the College follows theguidance in https://www.gov.uk/guidance/teaching-about-relationships-sex-and-health thereby developing a consistent and most effective approach to relationships, sex, and health education.

- The DSL will ensure that suitable measures are in place to filter and monitor the use of the Internet at College and to alert the DST to any problematic use.

- The DSL will ensure that the College takes due note of issues arising from the possibility of unlimited and unrestricted access to the Internet through the use of smart and mobile technology via advanced mobile phone networks which may increase the risk of abuse through harassment, YPSI and other harmful content.

- The DST will liaise with pastoral staff to promote an environment in which pupils feel safe and able tospeak to adults about their concerns.

- The DST will consider and provide suitable mechanisms through which both pupils and parents maybe involved in supporting the College in its approach to safeguarding.

- The College will provide a suitably detailed job description for each member of the DST.

- The DST will provide continuing support to a pupil about whom there has been concerns and who leaves the College by ensuring that appropriate information is provided or copied as guided by localchildren's services under confidential and secure cover to the child's new setting and ensuring the College medical records and safeguarding files are forwarded as a matter of priority.

- The DST will notify children's social care if a child with a child protection plan is absent for more than two days without explanation

- The College will normally seek to discuss any concerns about a pupil with their parents unless otherwise guided by local children's services and/or the police. This must be handled sensitively, and a member of the DST will make contact with the parent in the event of a concern, suspicion or disclosure.This may be delegated to another member of the Pastoral Staff, depending on the severity of the concern.

- However, if the College believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care and if necessary thepolice.

- The DSL will liaise with the headteacher to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. See

  https://www.gov.uk/government/publications/pace-code-c-2019/pace-code-c-2019-accessible

- Parents have access to a complaints procedure in relation to issues affecting the welfare of theirchildren which provides contact details for Independent Schools Inspectorate (ISI).

- The College also provides opportunities for its pupils to signal concerns and make complaints regarding their welfare: see 7.6 below.

- Where at risk children leave the College, the DSL will ensure that their child protection files are securely transferred to their new school as soon as possible and that the relevant local agencies are notified of thechild's departure.

7.4 Staff

- Members of staff should have a suitable understanding of KCSIE and of this safeguarding policy, of thetypes and signs of abuse, and of the management of disclosures, allegations and other safeguarding concerns.

- Members of staff must understand that if there is a risk of immediate harm to a child, they should actimmediately. Delay is unacceptable.

- Equally staff will recognise that if they have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the procedures in the safeguarding policy and speaking to the DSL

- The onus is upon the member of staff to report their concerns even if the concern appears to be minorin nature or if they have a 'niggling doubt' and are uncertain about the nature of their concern.

- Members of staff should follow the guidelines set down for listening to children, avoiding leadingquestions or avowals of belief in what is being disclosed by the child.

- Members of staff must never promise confidentiality to a pupil when this may compromise their safetyor well-being: all staff must be aware that the College has a professional as well as legal responsibility to share information with other agencies in order to safeguard children.

- Although they should understand that the DST is there to provide guidance and act on behalf of the child and the College, members of staff should be aware that anyone may make a referral to children's services or the police. However, members of staff should never contact parents themselves: this is a matter for the DST or for local agencies.

- Members of staff should not assume that another colleague or professional will take action on a safeguarding matter and should contact the DSL or appropriate external agency.

- All members of staff should understand the need to reassure victims of abuse or alleged abuse that they will be taken seriously, supported and kept safe.

- All staff need to be aware of the safeguarding issues and potential for child-on-child abuse within the boarding environment of the College.

- Members of staff may use the College's whistleblowing policy to draw attention in good faith to anyperceived failing with regard to safeguarding practice either in individual cases or concerning more general circumstances.

- Every member of staff should play their part in providing a safe environment for pupils.

- The College's Staff Code of Conduct sets out our expectations of staff and is read and agreed by all staff members, with particular regard to safeguarding matters including staff/pupil relationships and theuse of social media, but also taking note of the following requirements:
  - treating all pupils with respect
  - setting a good example by conducting ourselves appropriately
  - involving pupils in decisions that affect them
  - encouraging positive, respectful and safe behaviour among pupils
  - being a good listener
  - being alert to changes in pupils' behaviour and to signs of abuse, neglect and exploitation
  - recognising that challenging behaviour may be an indicator of abuse
  - reading, understanding and putting into practice, the College's child protection policy, staff behaviour policy and guidance documents on wider safeguarding issues, for example bullying,behaviour, physical contact, sexual exploitation, extremism, e-safety and information-sharing
  - asking the pupil's permission before initiating physical contact, such as assisting with physicalsupport during PE, Music or Drama or administering first aid
  - maintaining appropriate standards of conversation and interaction with and between pupils andavoiding the use of sexualised or derogatory language
  - being aware that the personal and family circumstances and lifestyles of some pupils lead to anincreased risk of abuse, (contextual safeguarding)
  - applying the use of reasonable force only as a last resort and in compliance with College andBerkshire West Safeguarding Children Partnership procedures
  - referring all concerns about a pupil's safety and welfare to the DSL, or, if necessary directly topolice or children's social care.

- All College staff will be aware that inappropriate behaviour towards pupils is unacceptable and that theirconduct towards pupils must be beyond reproach.

- In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for aperson over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the College staff and a pupil under 18 may be a criminal offence, evenif that pupil is over the age of consent. It is also viewed as an abuse of trust if there is a relationship between a member of staff and pupil over the age of 18.

- Any member of staff leading a trip or visit outside of College should liaise with the person responsiblefor educational visits and the DST to ensure that all appropriate safeguards are in place.

7.5 Staff with responsibilities in boarding houses

- Taking note of all the above responsibilities for members of staff, those with boarding duties shouldrecognise the additional responsibilities arising from boarding education and around the clock care.

- In particular boarding staff should not put themselves at risk by failing scrupulously to adhere to theguidance provided on staff/pupil relationships.

7.6 Pupils

- Pupils should work with the College to ensure that all may enjoy a safe and productive environment.

- Pupils should have the confidence to report any concerns, about themselves or others, including thoserelated to child-on-child abuse, to a member of staff who will in turn refer the report to the DSL or a member of her team.

- Pupils should not put themselves at risk when online, using smart or mobile technology, in thepublic arena, following the guidance provided through personal, health and social education and through other elements of the educational process in the College.

- Pupils are made aware of Safeguarding and Child Protection matters, for example through discussion in Wellbeing classes and through advice given in the Pupils' Handbook, and that, through a range of Co-Curricular opportunities, they have opportunity to develop the personality and confidence to keep themselves safe from potential and actual abuse (including abuse on line). There is curricular and pastoral provision to ensure that children understand how to keep themselves safe – including how to keep safe on- line.

7.7 Parents

- Parents must understand that, whilst the College will endeavour to involve them in matters relating to their children, the College may not, without proper authority to do so, relate the details or even fact of a disclosure to them: this will be the case when to do so may undermine the safety or well-being of a child: guidance is always sought from local children's services and/or the police on such occasions.

- Parents are expected to support the safeguarding work of the College including with regard to keeping children safe online including when using smart and mobile technology and when remote learning is necessary.

8   Types and signs of abuse

8.1   All employees, volunteers and contractors' employees at Bradfield have a central role in identifying anyabuse of children (and not only abuse taking place within College). They are expected expeditiously to report any signs or suspicions that a child is being abused to the DSL or one of her deputies.

8.2   Staff must be alert to signs of:

Physical Abuse*:* Bruises, scratch marks, sprains, bites, burns, scalds. The child may seek to coverup evidenceof abuse and be unwilling to become involved in games (especially swimming) or, even in hot weather, maywear clothing covering limbs: any sign of physical abuse should be reported.

Emotional Abuse: The child may exhibit depressive, difficult or disturbed behaviour (e.g. aggressive or destructive action, an inability to sustain relationships with peers). The child may seek adult attention and/or affection (e.g. choosing the company of adults – matron, a teacher – rather than that of his/her peers;inventing reasons to join in conversations with a teacher or HsM). The pupil may seek physical contact, or compensate by self-harming, over-eating, drinking, drug or substance abuse. Parents may appear fussy and over-protective. They may interfere with the development of independence, self-esteem and personal competence that are part of the child's normal growth. They may be unreasonably strict in their discipline exhibiting "Victorian patterns of parenting".

Sexual Abuse: Non-physical signs include: sudden changes in mood or behaviour, a knowledge of sexual matters (or vocabulary) far in advance of what is normative at their chronological age, a markedlack of trust in adults and an inability to develop and sustain stable relationships with their peers. They maytry to win or buy friends. Indications of a wish to disguise physical attractiveness (e.g. by over-eating or radical hair cutting) may be significant. The importance of 'sixth sense' indicators should not be under- estimated: a sense that one is inexplicably disconcerted when entering a room where all *looks* well between the occupants should not just be ignored. Over-rationalising can dismiss primary, instinctive impressions that are actually significant and warrant further investigation. Resources relating to child sexual abuse may be found at:

https://www.csacentre.org.uk/knowledge-in-practice/practice-improvement/supporting-practice-in-tackling-child-sexual-abuse/

Neglect: Irregular visits, by parents, or to home in term-time, with no apparent contact by letter or telephone, may be significant. The child's clothing may be old and/or in poor repair, he/she may be short of pocket money and tuck. Indications of limited parental supervision of weekend leave or poor provision ofmeals at weekends might be significant.

Domestic Abuse and Violence: violence in the home against partners or other members of the family or household may have significant impacts upon children even if they are not subject to violence themselves. They are likely to suffer from emotional abuse and/or neglect as a consequence of domestic violence directed at others. Guidance may be found through Operation Encompass:

https://www.operationencompass.org

Child-on-child abuse including bullying, online abuse, sexual violence and sexual harassment. Section 10 below provides additional details.

Online abuse includes but is certainly not restricted to: sharing inappropriate or illegal **content** (e.g. pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, or extremism); making harmful **contact** e.g. to groom or exploit for sexual, financial criminal or other purposes; **conduct** when online which causes or may cause harm (e.g. bullying, intimidatory or threatening behaviours; sharing of nude,pornographic, or other inappropriate images); involvement in risks associated with **commerce**, e.g. gambling or online scams.

Child Sexual Exploitation (CSE): is a form of sexual abuse where children are sexually exploited for money, power or status. It occurs where an individual or group takes advantage of an imbalance of powerto coerce, manipulate or deceive a child or young person under the age of 18into sexual activity. This imbalance may arise from a range of factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic and other resources.

It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status.

Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve

physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missingfrom home, care and education at some point.

Some of the following signs may be indicators of sexual or criminal exploitation:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or do not take part in education.

8.3   Staff must also be alert to the **general signs of abuse** which include:

- Disobedience, attention-seeking or aimless behaviour;
- Anti-social behaviour or delinquency;
- Hysterical attacks or sudden/violent changes in mood;
- Misuse of alcohol or other drugs;
- Changes in eating patterns, including loss of appetite, faddiness or an excessive preoccupation with food;
- Severe sleep disturbance with vivid dreams and/or nightmares;
- Inability to concentrate, or a sudden drop in College performance;
- Social isolation, poor peer-group relationships, an inability to make friends;
- Truancy or a reluctance to take weekend leave;
- Repeated absences;
- Self-mutilation;
- Talk of or attempts at suicide.

8.4   Forms of so-called **'honour-based' abuse (HBA) and female genital mutilation (FGM)** are child abuse. If a teacher discovers that an act of FGM appears to have been carried out on a girl under the age of 18 the teacher must report this to the police. **HBA** may include but is not restricted to **FGM** and forced marriage. Children may become entangled in inter-family or other disputes which may involve some form of punitive violent action or non-violent abuse against a member of the child's family or the child themselves. There have been cases of acid attacks and arson as well as murder. Staff should be vigilant and report any suspicions of a child being at risk of or already having suffered HBA to the DSL without delay.

8.5   **Fabricated or induced illness** is a condition whereby a child suffers harm through the deliberate action of her/his main carer and which is attributed by the adult to another cause. There are four main ways of the carer fabricating or inducing illness in a child:

- Fabrication of signs and symptoms, including fabrication of past medical history.
- Fabrication of signs and symptoms and falsification of hospital charts, records, letters and documents and specimens of bodily fluids.
- Exaggeration of symptoms/real problems. This may lead to unnecessary investigations, treatment and/orspecial equipment being provided.
- Induction of illness by a variety of means.
- Harm to the child may be caused through unnecessary or invasive medical treatment, which may be harmful and possibly dangerous, based on symptoms that are falsely described or deliberately manufactured by the carer, and lack independent corroboration.

In cases of suspected Fabricated and Induced Illness the College will work closely with other agencies to ensure information is shared appropriately. Where a child has suffered, or is likely to suffer, significant harm, the College will make a referral to Children's Social Care.

Other forms of abuse may arise from **gang exploitation** or involvement and the associated exploitation of children through involving them in **county lines**, a term used by the police term forurban gangs supplying illegal drugs (primarily but not only crack cocaine and heroin) to suburban areas and market and coastal towns using dedicated mobile phone lines or "deal lines". It involves **Child Criminal Exploitation (CCE)** as gangs use children and vulnerable people to move and/or store drugs and money. A common feature in county lines drug supply is the exploitation of young andvulnerable people. The dealers will frequently target children to act as drug runners or move cash so they can stay under the radar of law enforcement. Guidance on how to protect pupils may be found in:

https://youthendowmentfund.org.uk/toolkit/

CCE may also involve modern slavery including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk**)**

8.11   Children exploited in this way will quite often be exposed to physical, mental and sexual abuse, and to serious violence, and in some instances will be trafficked to areas a long way from home as part of the network's drug dealing business. These involved often don't see themselves as victims or realise they have been groomed to get involved in criminality. Again, as with CSE, this imbalance may arise from a range of factors including gender, sexual identity, cognitive ability, physical strength, status, and access toeconomic and other resources. Further guidance may be seen at:

https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults- county-lines/criminal-exploitation-of-children-and-vulnerable-adults-county-lines

8.12   Pupils with **special educational needs** are often more vulnerable to manipulation and abuse by adults and by their own peers. All pupils with a SEND profile are flagged in the College's data management system and staff are required to note this aspect of a child's profile when they teach them or have pastoral dealingswith them. The special vulnerabilities of pupils with SEND profile is addressed in Safeguarding INSET. See also section 13.

8.13   Other children at greater risk of harm include:

- those who need a social worker; those requiring mental health support;

- looked after children

- previously looked after children

- children who are homeless even temporarily

- children who are required to give evidence in court either for crimes committed against them or for crimes they have witnessed

- children who are involved in family court proceedings relating to separation and other family matters children with family members in prison: These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health.

    The National Information Centre on Children of Offenders, NICCO provides information to support professionals working with offenders and their children, to help mitigate negative consequences for those children

- children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

    If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the **Cyber Choices** programme.

    This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

8.14   On receipt of a report that a child is presenting such identified signs of actual or potential abuse, the DSL

will open a file in the College Child Protection Register and discuss the matter with the Contact, Advice and Assessment Team (CAAS) at West Berkshire Council.

8.15   The DSL will request from HsMs each term a brief report on the progress and wellbeing of each pupil listed in the Child Protection Register and will take appropriate action as and when required.

9   Disclosures: guidance to staff

9.1   All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to the likes of drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth-produced sexual imagery) put children in danger.

9.2   Safeguarding incidents and/or behaviours can be associated with factors outside the College and/or can occurbetween children outside the College. All staff, but especially the DST should be considering the context within which such incidents/behaviours occur. This is known as contextual safeguarding, which simply meansassessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

9.3   It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they mayhave lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.

9.4   If a student talks to a member of staff about any risks to their safety or wellbeing, **the staff member will need to let the student know that they must pass the information on** – staff are not allowed to keep secrets. The point at which they tell the student this is a matter for professional judgement. If they jump in immediately the student may think that they do not want to listen, if left until the very end of the conversation, the student may feel that they have been misled into revealing more than they would have otherwise

9.5   If a pupil discloses to a member of staff some form of abuse (other than an allegation against a member of staffwhich is dealt with in section 11 of this policy), the member of staff concerned should adhere to the followingprocedure:

- Listen to all the pupil says sympathetically but without avowing belief in what is said, reassuring the pupil that they will be taken seriously, supported and kept safe and not made to feel that they are creating a problem for reporting abuse, sexual harassment or sexual violence.

- Make a record of what is said either contemporaneously or as soon as possible afterwards: write up their conversation as soon as possible and submit to the DSL or deputy DSL. These notes should use the student's words and be included in the details of the concern section of the report and uploaded as an attachment. It will also include the **time, date and place of the disclosure and who was present.** It should be factual and differentiate between fact/ opinion/ interpretation. The more detail the better. Sign and date the note. The original notes must be passed to the DSL or deputy DSL for secure filing.

- This note must record any observed physical evidence (e.g. injuries or bruises - staff should never ask to see a reported injury; this point relates only to injuries that are immediately evident) and record the non-verbal behaviour of the pupil and the actual language used by the pupil when making the disclosure. This note may be used in any subsequent court proceedings and so is an extremely important contemporary record, so it must be made with REAL CARE.

- It is not appropriate to lead the child in any way, to guess or to make suggestions.

- Allow students to speak freely.

- Remain calm and not overreact – the student may stop talking if they feel they are upsetting their listener.

- Give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'.

- You may reassure the child that his/her disclosure is in line with the College's Safeguarding Mission Statement.

- Do not be afraid of silences – staff must remember how hard this must be for the student.

- Do not promise confidentiality.

- Explain that the substance of the disclosure will be passed on, but only to those who need to know, and that

the child will be told when this happens.

- Avoid admonishing the child for not disclosing earlier. Saying things such as 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be the staff member's way of being supportive but may be interpreted by the child to mean that they have done something wrong.

- Do not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused.

- Do tell the pupil what happens next: who will be told.

- Notify a member of the DST **immediately**.

- Keep the pupil in a place of safety. Do not leave them alone. must ensure that the pupil feels secure once the disclosure is concluded. It may be appropriate to hand the child, with their assent, into the care of the House Matron or their HsM, or some other carer, saying that they have been upset. If this is necessary, the disclosure of abuse must **not** be mentioned, under any circumstances.

- If the pupil is in need of medical attention, take them to the medical centre.

- Do not ask the pupil to reveal any part of their body not normally clothed even if they offer to do so.

- Do not discuss the disclosure with any person other than a member of the DST.

- Do not attempt to resolve or investigate the matter in part of whole yourself: this is entirely a matter for the DST and external agencies.

- Remember you are not the Police or Social Services: please listen, record and report.

- You must pass on the notes to:
  o the DSL or her Deputies (unless the disclosure relates to an employee or volunteer working at the College);
  o the Headmaster if the disclosure constitutes an allegation against a member of the College staff or a volunteer working at the College: see section 11 of this policy.
  o the Warden if the disclosure constitutes an allegation against the Headmaster: see section 11 of this policy.

- Do seek support from the DST: receiving a disclosure may be stressful and disturbing.

- If you simply have a suspicion of abuse and there is no disclosure, then report this to the DSL or a DDSL immediately.

Remember:

Anyone may make a direct referral to local children's services and/or the police: but it is helpful to inform the DSL or a DDSL as soon as possible afterwards.

10   Child-on-child Abuse

10.1   The College maintains a **zero-tolerance policy** towards all forms of child-on-child abuse, both face-to-face and online, including sexual violence and sexual harassment and all forms of bullying. The College seeks to ensure that no form of any such abuse (no matter how 'low level' it may appear) is ever dismissed as a joke or banter or just a part of growing up. Child-on-child abuse can take many forms including: actual sexual violence; instances of sexual harassment; abuse within intimate partner relationships; child-on-child physical abuse; sharing inappropriate images online and sexting; initiation rites (or "hazing") whether online and face-to-face which may include harassment, abuse or humiliation and which have historically been a commonplace problem in boarding communities; ritual violence; up-skirting. The abuse is often gendered in character and staff need to be aware that developing adolescent attractions and relationships have the potential to become "nasty". Staff will also be aware of the existence of abuse within families and the impact of this upon siblings.

10.2   The College will take all reasonable measures to minimise the risk of child-on-child abuse, including through the preventative education and other measures provided in PSHE, Wellbeing, RSE, pupil behaviour and anti-bullying programmes. Particular attention will be paid to protected characteristics under the Equality Act 2010, including: disability; gender reassignment; race; religion or belief; sex; sexual orientation.

10.3   The College takes particular note of the potential impact of child-on-child abuse on the mental health of pupils and the PSHE and wellbeing programmes are designed to minimise the risk of such abuse. Through these programmes, the College will ensure that pupils understand that the law is there to protect them.

10.4   The College aims to take a Contextual Safeguarding approach that takes into account the particular risks that children at Bradfield are most likely to be exposed to, and the nature of the abuse they are most likely to experience – including online. To this end, the College will conduct a proactive risk assessment to determine the more likely risks to which its pupils are or may be exposed, assess and monitor those risks, and keep the assessment under annual review. It will put in place action plans to address identified risks and keep these under regular review. The outcome of the risk assessment will inform the College's approach to child-on-child abuse, inform the College's curricular work on Safeguarding and its informal pastoral work, and be considered in governors' oversight of safeguarding at the College.

10.5   The College has consulted its Local Safeguarding Partnership's Safeguarding Policy and Procedures and takes account of local thresholds. It understands that child-on-child abuse is a complex issue and often an indicator of wider safeguarding concerns. It understands that addressing child-on-child abuse may requires effective partnership working within the LSP.

10.6   The College recognises that social and institutional attitudes can underpin abusive behaviour amongst peers and aims to keep attitudes and conventions of tolerance under review so that inappropriate behaviour is better recognised and addressed with expedition. Fundamental to Bradfield's approach is the active promotion of gender equality and equalities associated with race, sexual orientation and gender identity. The College is alert to issues related to the Black Lives Matter and Everyone's Invited agendas and is committed to the promotion of positive values and healthy relationships and seeks to embed ongoing, systematic education and training (both of pupils and staff) throughout the institution.

10.7   In its response to expressions of concerns or explicit allegations of child-on-child abuse, the College will always seek to act in a manner that is sensitive, proportionate and prompt. It is obviously helpful if the identity of the alleged abuser(s) is specified in any disclosure. However, a pupil(s) disclosing abuse will never be pressed to reveal names during the initial disclosure (such details can be dealt with as the disclosure is followed up by the Children's Services, Police or College). The person receiving a disclosure of abuse by pupils will never attempt to guess the identity of the pupil(s) being spoken of.

10.8   On receiving report of any expressions of concern or specific allegation of child-on-child abuse, the DSL will contact West Berkshire Children's Services and/or the police immediately (and, in any event, within 24 hours of becoming aware of the alleged behaviour) and discuss the concern(s) or allegation(s) with the agency and agree on a course of action. This may include:

- managing the concern/allegation internally with help from external specialists where appropriate and possible;
- contributing to an inter-agency early help assessment, with targeted early help services provided toaddress the assessed needs of a child/children and their family;
- referring the child or children to children's services for a statutory assessment and/or reporting allegedcriminal behaviour to the police.

10.9 The most recent version of *Working Together to Safeguard Children* sets out to correct common myths aboutthe laws of privacy, data protection and confidentiality that can hamper effective keeping and sharing of records in cases of alleged or suspected child-on-child abuse. Bradfield College understands that if there are legitimate safeguarding concerns about a child, then data protection law allows schools and professionals to share and retain even the most sensitive personal data as necessary to support their policies (even when itis not feasible to obtain consent). It also understands that the records it keeps relating to concerns or allegations of child-on-child abuse must be accurate, clearly describe the nature of the alleged behaviour without using euphemisms and contain only information adequate for the purpose.

10.10 Because these records are likely to contain highly impactful, sensitive personal data about children, the College will take care when creating them and ensure that they are accessed on a need-to-know basis only, and by trained and appropriate staff. Further, those with responsibility for compiling the records will bear in mind that the records may need to be provided to the children involved and/or their parents in the futureand take care that the notes and related communications are concise, factual and objective, focused only on what is necessary for their safeguarding purpose. Where note is made of opinion or unsubstantiated judgement this material will be clearly flagged as non-objective, non-factual data.

10.11 The recording of non-objective opinion will take place only when it is judged necessary by the DSL andthe making of such records will always be minimised. The language used in the notes will always be appropriateand professional.

10.12 Where the College considers that disciplinary action is appropriate for any child/children involved in child- on-child abuse it will take account of any ongoing police proceedings and, in such circumstances, work fully in partnership with the police and/or children's services. Where the matter is not of interest to the police and/or children's services, the College, will seek to take disciplinary action appropriate to ensure positive behaviour management. Before finalising any disciplinary response, the College will always consider its duty to safeguard from harm all children in its care; any identified underlying reasons for a child's behaviour; any unmet needs, or harm or abuse suffered by the child at issue; the risk that child may pose to other children; and the severity of the child-on-child abuse.

10.13 The College understands that in circumstances of child-on-child abuse both the victim and the perpetrator will require on-going pastoral and educative support, going forward, and the provision of such support will form part of the disciplinary record made of the College's response to any incident; it also understands such terms as 'survivor' may be more appropriate for some than 'victim' and will respond sensitively.

10.14 The response of Bradfield to concerns or allegations of child-on-child abuse will, further, form part of the College's ongoing proactive work to embed best practice. The response by the College may become part of itswider prevention work.

10.15 Children who are victims of sexual violence and sexual harassment will likely find the experience stressfuland distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (and be both physical and verbal) and are never acceptable and the College engages with the issues through preventative education programmes. It is important that all victims are taken seriously, offered appropriate support and reassured that their wishes will be taken into consideration. Bradfield staff should beaware:
- that it is more likely but not invariable that girls will be the victims of sexual violence, and more likely thatsexual harassment will be perpetrated by boys: but we affirm that all child-on-child abuse is unacceptable and will always be taken seriously;
- there is a cultural problem apparent in the UK when it comes to the treatment of women and minoritiessuch as the black community;

- of the importance of making clear that sexual violence and sexual harassment is **never acceptable**, willnever be tolerated and is not an inevitable part of growing up;
- that it is **not** acceptable to tolerate sexual violence or sexual harassment as "banter", "part of growing
up", "just having a laugh" or "boys being boys";
- that they **must** always challenge inappropriate language and behaviours including those which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia: dismissing or tolerating such language and behaviours risks normalising them.

10.16   Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded orhumiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks aboutclothes and appearance and calling someone sexualised names;

- sexual "jokes" or taunting;

- discriminatory or prejudice-based bullying or harassment

- physical behaviour, such as: deliberating brushing against someone, interfering with someone's clothes (Bradfield College will always consider if such actions cross the line into sexual violence - it will always talk to and consider the experience of the victim) and displaying pictures, photos ordrawings of a sexual nature;

- up skirting, where a picture is taken under a person's clothing, without them knowing, for the purposes ofsexual gratification or the humiliation of the victim;

- online sexual harassment, which might include: consensual and non-consensual sharing of sexual images and videos and sharing sexual images and videos (both often referred to as sexting); inappropriate sexual comments on social media; exploitation; coercion and threats.

- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party

   Further details may be seen at: https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi- nudes-advice-for-education-settings-working-with-children-and-young-people

10.17   Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence both online and face-to-face.

10.18   Sexual harassment (as set out above) creates an atmosphere that, if not challenged, can normalise inappropriatebehaviours and provide an environment that may lead to sexual violence.

10.19   Children who are Lesbian, Gay, Bi, or Trans (LGBTQIA+) can be targeted by their peers. In some cases a child who is perceived by their peers to be LGBTQIA+ (whether they are or not) can be just as vulnerable as childrenwho identify as LGBTQIA+. The College will ensure that there are one or more trusted adults to whom LGBTQIA+ pupils may turn if the need arises.

10.20   Children with special educational needs and/or disabilities are also vulnerable to abuse by their peers. See section 13.

10.21   The College understands that the wellbeing of boarders is a primary concern and accordingly does not ignore the potential impact of any sexual violence or sexual harassment within the boarding environment: the College therefore aims to promote good and not harmful relationships within boarding houses, providing opportunities for pupils to raise concerns as well as enabling all pupils to engage productively with the various preventative education programmes available to pupils.

10.22   Any pupil accused of child-on-child abuse including sexual violence or sexual harassment is also in need of support and the College will liaise with local Children's Social Services and/or the Police to determine howthis may be most effectively provided, noting that the wishes of the child concerned provide an important consideration.

10.23 Appropriate and sensitive attention will be given to the possible need to separate those accused of abuse from those who may have been subject to abuse.

10.24 The investigation of any report of sexual violence or sexual harassment will follow the protocols set out in this policy for disclosures and take into account the additional guidance set out in Part 5 of KCSIE. As soonas any report is made, immediate consideration must be given as ton how best to support and protect the victim(s) and alleged perpetrator(s). As well as engaging with local children's services and other specialist services as required, the DST will prepare an assessment of risks posed to pupils and others, including the victim or victims, the alleged perpetrator, all other directly or indirectly affected. Where the report involves online material it is vital that the matter is referred to the police or children's services for guidance: it is a criminal offence to view ort forward any illegal images of a child.

10.25 Any member of staff receiving a disclosure of sexual violence or harassment will follow the protocols laiddown in this policy for disclosures but if possible managing the disclosure with a member of the DST.

10.26 We recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported.

10.27 Should a report be determined to be unsubstantiated, unfounded, or false, the DSL will consider: both whether or not the child or person making the allegation is in need of help or may have been abused by
someone else; and also a referral to children's services. Reports that are deliberately invented or malicious, the
College will determine whether or not disciplinary action is warranted.

11 Allegations against staff

11.1 All College staff (which always includes supply staff and contractors for safeguarding purposes) and volunteers should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults. Particular care should be taken by those teaching on a one-to-one basis, by boarding staff, by those involved in the personal care of children, and by those who may come into physical contact in the course of educational demonstrations with pupils.

11.2 All staff and volunteers should have read and understood the College's staff behaviour and conduct policy.

11.3 Guidance about conduct and safe practice, including safe use of mobile phones by staff and volunteers, will be given at induction and reinforced at regular intervals. Particular note should be taken of the fact that communications between pupils and adults, by whatever method, are transparent and take place within clear and explicit professional boundaries and are open to scrutiny. Should a member of staff be required to use reasonable physical restraint on any occasion, this must be reported immediately to the Headmaster or in his absence to the DSL: a written record is maintained of such instances by the Headmaster.

11.4 If a pupil makes an allegation however low-level this might seem against a member of staff other than the Headmaster, or information is received which suggests that a member of staff may be unsuitable to work with children, the member of staff receiving the allegation or being made aware of the information, will immediately inform the Headmaster without informing the member of staff who is the subject of the allegation. If the person making the allegation believes that there may be a conflict of interest involved on the part of the Headmaster, then contact should be made with the Warden or with the local authority designated officer (LADO).

11.5 Any person receiving an allegation must not ask leading questions nor guarantee confidentiality to the person making the allegation and must make a written record of what is said by the person making the allegation either contemporaneously or as soon as possible afterwards. This record must be handed to the person stipulated in 13.6 or 13.7 below. However, any person may make a referral to the local authority (Contact, Advice and Assessment Team (CAAS), telephone number 01635 503 090), the local authority Designated Officer (DO or LADO), and/or police in such cases. The matter should not be discussed with others.

11.6 The Headmaster on all such occasions will discuss the content of the allegation with the local authority Contact, Advice and Assessment Team (CAAS) (number 01635 503 090) and Designated Officer (DO or LADO) and if a crime is alleged with the police at the earliest opportunity and within one working day of receiving the allegation. Following confirmation from the local authority and/or police that it is appropriate to do so, the College will keep the agency informed of any actions taken.

11.7 If the allegation made concerns the Headmaster, then without notifying the Headmaster this must be referred to the Warden or in her absence the Deputy Warden who will immediately (and within one working day) consult the local authority Contact, Advice and Assessment Team (CAAS) (number 01635 503 090) and Designated Officer (DO or LADO) within one working day and if a crime is alleged with the police without notifying the Headmaster first.

11.8 The College will follow the local authority guidance for managing allegations against staff and the College will proceed only when given permission by the local authority and/or police to do so.

11.9 Suspension of the member of staff, excluding the Headmaster, against whom an allegation has been made, needs careful consideration, and the Headmaster will seek the advice of the local authority in making this decision.

11.10 In the event of an allegation against the Headmaster the decision to suspend will be made by the Warden in consultation with the local authority in making this decision.

11.11 The College will ensure that any disciplinary proceedings against staff relating to child protection matters are concluded in full even when the member of staff is no longer employed at the College and that notification of any concerns is made to the DBS, in accordance with the legal requirement on the

Collegeto do so (noting that it is a criminal offence not to refer when the criteria are met), with consideration being given to referral to the TRA, and included in references where applicable.

11.12   Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly ,and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected. Consideration will be given to placing a suspended employee normally resident in College accommodation in temporary accommodation off-site, provided at the College's expense. The views of theLADO and/or police must be given due weight in reaching a decision to suspend.

11.13   Consideration will be given to the needs of the child and a recognition that a child may make an allegationagainst an innocent party because they are too afraid to name the real perpetrator. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of eventsdo happen. The parents, carers or guardians of the child concerned Inform the parents of the child(ren) involved, making them aware of the prohibition on reporting or publishing allegations about a teacher (§ Section 141 F of the Education Act 2011) and make arrangements to keep them informed about the progress of the investigation

11.14   The College will ensure that all staff are aware of the need for maintaining appropriate and professional boundaries in their relationships with pupils and parents/carers as advised within the staff behaviour codeof conduct. As part of the Induction process, all staff will receive guidance about how to create appropriate professional boundaries (in both the real and virtual world) with all children, especially those with a disability or who are vulnerable and those who board.

11.15   The College will ensure that staff and volunteers are aware that sexual relationships with pupils aged under18 (or any pupil classified as a vulnerable adult) are unlawful and could result in legal proceedings taken against them under the Sexual Offences Act 2003 (Abuse of Trust). Sexual relationships between a member of staff and any pupil aged 18 and over constitute gross professional misconduct and will result in disciplinary proceedings.

11.16   Should the College employ supply staff from an agency, the College will inform the agency of its process for managing allegations: the College and not the agency is responsible for reporting allegations to the localauthority and/or police. Likewise, the employer of any contractor subject to an allegation will be kept informed as following the same protocols for supply agencies.

11.17   The rationale for all decisions and actions taken must be recorded.

11.18   In cases where an employee or volunteer is <u>suspended</u> during an investigation, the Headmaster will:

- Recognise that suspension of an employee /volunteer in such circumstance must not be construed as adisciplinary penalty. (In consequence a suspended member of staff will be in receipt of full pay and benefits. Voluntary alternatives to suspension - e.g. paid leave of absence - may be considered by the Headmaster.)

- Interview the employee/volunteer. An employee will be entitled to bring a trade union representative (ora friend) to the interview. At the interview, the employee or volunteer will be informed of the allegation laid against them and provided with all possible information not prejudicial to the conduct ofthe investigation.

- Send the suspended employee/volunteer written notification of the reasons for suspension within 24hours of the oral interview. In this written notification the employee/volunteer will be provided with the name of a member of the SMT who will act as an information channel, keeping them abreast of the progress of the investigation.

- Inform the Warden and Council of the suspension.

- Inform the pupil who has made an allegation (and his/her parents) that the accused employee/volunteer has been suspended.

In cases where an employee or volunteer is <u>not suspended</u>, the Headmaster will:

- Interview the employee/ volunteer, informing him/her of subsequent actions to be taken by the Collegeand/or Contact, Advice and Assessment Team (CAAS). The Headmaster will discuss whether the employee or volunteer has any wish to receive support or counselling during the

investigation. An employee or volunteer will be entitled to bring a trade union representative (or a friend) to the interview.

11.19   The College will follow legal guidance for any allegation found to be substantiated, unsubstantiated, false,or malicious and will set out in all such cases the details of any lessons which have been learnt.

11.20   **Low-level concerns:**

- These are likely to arise when the concern arises from a niggling doubt or a general worry rather than a specific safeguarding concern about conduct: e.g. behaviour which may be regarded as inconsistent with the staff code of conduct including apparently inappropriate conduct away from work; or where the allegation fails to reach the threshold for referral to the LADO. See Appendix C for further guidance.

- Example of conduct which might give rise to low-level concerns: being over-friendly with pupils; having favourites; taking photographs of individual pupils in secluded areas; engaging with a pupil behind closeddoors; using inappropriate language.

- Staff should remember that the code of conduct is there to protect all members of the school community including themselves.

- If you have a niggling doubt or any low level concern but no clear allegation about any situation involving staff, report this immediately to the Headmaster or if it concerns the Headmaster to the Warden, without informing the person regarding whom you have a niggling doubt or any other person.

- Any such report will be recorded with a note of the record being held by the designated safeguarding governor and if there is any doubt about the seriousness of the doubt, the Headmaster or Warden will seek the advice of the local authority in making this decision. The name of the person reporting will be noted, respecting wishes to remain anonymous as far as reasonably possible.

- Records of low-level concerns will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and responded to. Where a pattern of behaviour is identified, the College will decide on an appropriate course of action. This might be internal disciplinary procedures, or referral to the LADO if the harms threshold is met.

- The College will consider if any wider cultural issues in College that enabled the behaviour to occur and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence.

12 Children in need of early support and intervention

12.1 Early help means providing support as soon as a problem emerges at any point in a child's life. Providingearly help is more effective in promoting the welfare of children than reacting later. A child in need is defined as a child who is unlikely to achieve or maintain a reasonable level of health or development; or whose health and development is likely to be significantly or further impaired, without the provision ofservices; or a child who is disabled.

12.2 Effective early help relies upon local agencies working together to identify children and families who would benefit from early help, to undertake an assessment of the need for early help and to provide targeted early help services to improve the outcomes for the child and prevent needs escalating to a pointwhere intervention from children's services would be needed. Staff are made aware of the roles they might have with regard to early help.

12.3 Inter-agency assessments should take place when a child and family would benefit from coordinated supportfrom more than one agency (e.g. education, health, housing, police). The assessment should be undertaken by a lead professional who should provide support to the child and family and coordinate the delivery of support services. The lead professional could be a teacher, family support worker, health visitor or GP and the decision about who should be the lead professional should be informed by the child and their family. Examples of support services include family and parenting programmes, assistance with health issues and help for problems relating to drugs and alcohol.

12.4 For early help assessment to be effective: the assessment should be undertaken with the agreement of the child and their parents and should involve the child and the family as well as the professionals working with them; and professionals should be able to discuss concerns they may have about a child and family with a social worker in the local authority.

12.5 If consent is not given for an early help assessment, the DST should consider how the needs of the childmight be met. If at any time it is considered that the child may be a child in need or that the child has suffered significant harm or is likely to do so, a referral to the local authority's children's service should be made immediately.

12.6 Staff should discuss emerging problems and early help requirements with the DST. If early help is appropriate, the DST will generally lead on liaising with other agencies and setting up an inter-agency assessment. Staff may be required to support other agencies and professionals in an early help assessment, insome cases acting as the lead professional as appropriate.

12.7 Any such cases should be kept under constant review and consideration given to a referral to local authority's children's service for assessment for statutory services if the child's situation does not appear tobe improving or is getting worse. Referrals to Children's Social Care/Services for statutory assessments are made under the Children Act 1989:

- Section 17, Child in Need: a child in need is a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services. Local authorities are required to provide services for childrenin need for the purposes of safeguarding and promoting their welfare.

- Section 47, Child suffering or likely to suffer significant harm: local authorities, with the help of other organisations as appropriate, have a duty to make enquiries if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiatedwhere there are concerns about maltreatment, including all forms of abuse and neglect, female genitalmutilation or other so-called honour-based violence and extra-familial threats like radicalisation and sexual exploitation.

- There may be a need for children's social care and services and/or the police to provide immediate protection whilst an assessment or enquiries are carried out.

12.8 The DST is responsible for maintaining effective records of all such cases.

12.9 KCSIE states that any child may benefit from early help, but all College staff 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)

- is a young carer

- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement andassociation with organised crime groups

- is frequently missing/goes missing from care or from home

- is at risk of modern slavery, trafficking or exploitation

- is at risk of being radicalised or exploited

- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse

- is misusing drugs or alcohol themselves

- has returned home to their family from care

- is a privately fostered child

13   Special education needs, disabilities, and other vulnerabilities

13.1   We recognise that, statistically, children with emotional and behavioural difficulties and disabilities are mostvulnerable to abuse. College staff who deal with children with complex and multiple disabilities and/or emotional and behavioural problems should be particularly sensitive to indicators of abuse.

13.2   We also recognise of the potential for children with SEND or certain medical conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs; and that these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children.

13.3   The College has pupils with emotional and behavioural difficulties and/or challenging behaviours. The College will support staff to decide appropriate strategies that will reduce anxiety for the individual child andraise self–esteem as part of an overall behaviour support plan agreed with parents/carers.

13.4   As part of our pastoral programmes, staff will teach young people personal safety skills in an age appropriate manner. Pupils will be taught on how to keep themselves safe, and about peer pressure andappropriate relationships.

13.5   We have pupils who may have learning difficulties and we are aware that they are vulnerable to abuse because they may be unable to express themselves to others. Instead such pupils may exhibit changes inbehaviours or signs and indicators of abuse such as mood and injury recognised by staff with a good knowledge of the child.

13.6   Where necessary, the College will provide additional training to staff in the use of alternate communicationsystems, noting that there may be communication barriers and difficulties in managing or reporting these challenges. Supervision by senior managers will be vigilant to create a protective ethos around the pupil.

13.7   We promote high standards of practice, including ensuring that children with disabilities know how toraise concerns, and have access to a range of adults with whom they can communicate.

13.8   We are also aware of the vulnerability of other pupils, including those Children who are Lesbian, Gay, Bi,or Trans (LGBTQ+) can be targeted by others. In some cases, a child who is perceived to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+.

14   Other Concerns

14.1   Children Missing Education (CME), Children Reported Missing, and Children Absent from Education

All children of school age, regardless of their circumstances, are entitled to full-time education which is suitable to their age, ability, aptitude and any special educational needs or disabilities they may have.

The College distinguishes between:

pupils who leave the College and may be at risk of missing education completely, i.e. not receiving appropriate education;

pupils on roll who are reported as missing as opposed to being absent from College; and

pupils who are absent from the College for prolonged periods and/or on repeat occasions.

14.2   As indicated in Keeping Children Safe in Education, 'a child going missing from education is a potential indicator of abuse or neglect'. All staff should be aware that children going missing may act as a vital warning sign of a range of safeguarding possibilities. Equally children being absent from education for prolonged periods and/or on repeat occasions may act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. This may include abuse and neglect(potentially sexual abuse or child criminal exploitation). It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM or forced marriage.

14.3   Early intervention is necessary to identify any underlying safeguarding risk and to help prevent the risks of the child going missing in future.

14.4   Staff working within the College know and implement the College's policy on Missing Children actively search for children who are reported as missing, including working with the police where appropriate. Any child subject to a Multi-Agency Child Protection Plan who is missing without satisfactory explanation will be reported to their Key Social Worker as soon as possible and within two days in any case.

14.5   Staff will monitor pupils' attendance and will inform senior staff who in turn will be in touch with the local children's services for pupils who are regularly absent from College or have missed 10 school days or more without permission.

14.6   The College will notify the local authority when a pupil of school age is to be deleted from the admission register.

14.7   Where reasonably possible, the College will hold more than one emergency contact number for each pupil.

14.8   Looked-After Children (LAC)

A 'Looked-After' Child is one who is subject to a care order (either an interim or a full care order), or whois voluntarily accommodated by the local authority.

The most common reason for children to be looked after by the Local Authority is as a result of abuseand/or neglect.

Appropriate pastoral staff should have all the relevant information required about:

- The child's looked after legal status (i.e. they are looked after under voluntary arrangements with the parents' consent, or are under an interim or full care order)

- The levels of authority delegated to the carer by the local authority

- Details of the child's social worker

- The name of the Virtual School Head in the authority that looks after the child (a Virtual School Head isan officer employed by the local authority to promote the educational achievement of the child)

Any Looked-After Children in the College are supported by a designated teacher, whose aim is to promote

and support their educational progress.

A previously Looked-After Child remains potentially vulnerable, and, where relevant, all staff will be supported to develop the skills, knowledge and understanding to keep him/her safe. In such a case the DSL and pastoralteam would work closely with all agencies.

The College recognises the need for prompt action to be taken when necessary to safeguard any LAC children,given their particular vulnerabilities.

14.9   Homelessness

There are many situations which are potentially harmful or concerns which may cause harm to children,and any evidence of any of these should be presented to the DST without delay.

Being or being at risk of becoming homeless present a real risk to a child's welfare. The DSLs are aware ofthe contact details and referral routes in the Local Housing authority so that they can raise concerns quickly where needed, together with a referral to Children's Social Care if a child is at risk of harm.

Indicators that a family may be at risk of homelessness may include a family being asked to leave a property or other such as:

- Household debt

- Rent arrears

- Domestic abuse

- Anti-social behaviour

14.10   **Further concerns:**

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds.

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those

children.

Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk**)**

Cybercrime

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the **Cyber Choices** programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that **Cyber Choices** does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK.

15 Prevent Strategy and Safeguarding

15.1 The College values freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society's values. Both pupils and teachers have the right to speak freely and voice theiropinions. However, free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

15.2 The College follows statutory guidance in its efforts to protect children and young people against the messages of violent extremism and all staff are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology taking note of the College's Prevent Risk Assessment: the College has due regard to 'the need to prevent people from being drawn into terrorism' in line with the Counter-Terrorismand Security Act 2015 and Prevent Duty guidance.

15.3 Radicalisation is a process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. An act of terrorism typically endanger or cause serious to others or to property or to electronic systems.

15.4 Members of staff complete an online general awareness training module on Prevent that includes information on when it is appropriate to make a referral to Channel on a schedule to be determined inconsultation with the local children's services.

15.5 Staff are aware of the increased risk of online radicalisation. Suitable IT filtering, screening and monitoring is in place on the College's computer system.

15.6 Visiting speakers will be vetted so that the College can be satisfied that the information provided by speakers will be aligned to the ethos and values of the College and to British values.

15.7 Any concerns in relation to possible radicalisation will be discussed with a pupil's parents unless there is a specific reason to believe that to do so would put the pupil at risk.

15.8 Staff will be made aware at safeguarding training of the guidance offered in the Revised Prevent Guidance for England and Wales (2015) and will be alerted to characteristics within children and families that may indicate radicalisation or warning indicators of those who may be vulnerable to radicalisation.

15.9 Staff will treat any radicalisation or extremism concerns in the same manner as safeguarding concerns and will follow the College's safeguarding and child protection procedures as outlined in the blue card.

15.10 Indicators of radicalisation

- Identity Crisis: distance from cultural or religious heritage and uncomfortable with their place in the society around them

- Personal Crisis: family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging

- Personal Circumstances: migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy

- Unmet Aspirations: perceptions of injustice; feeling of failure; rejection of civic life

- Criminality: experiences of imprisonment, probation, etc.; poor resettlement or reintegration, previous involvement with criminal groups

Further guidance on possible indicators may be found at:

https://educateagainsthate.com/radicalisation

Access to extremism and extremist influences; questions to ask:
- Is there reason to believe that the pupil associates with those known to be involved in extremism – either because they associate directly with known individuals or because they frequent key

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locations where these individuals are known to operate? (e.g. the pupil is the partner, spouse, friend or family member of someone believed to be linked with extremist activity)

- Does the pupil frequent, or is there evidence to suggest that they are accessing the internet for the purpose of extremist activity? (e.g. Use of closed network groups, access to or distribution of extremist material, contact associates covertly via email etc.)

- Is there reason to believe that the pupil has been or is likely to be involved with extremist/military training camps/locations?

- Is the pupil known to have possessed or is actively seeking to possess and/or distribute extremist literature/other media material likely to incite racial/religious hatred or acts of violence?

- Does the pupil sympathise with, or support illegal/illicit groups e.g. propaganda distribution, fundraising and attendance at meetings?

- Does the pupil support groups with links to extremist activity but not illegal or illicit e.g. propaganda distribution, fundraising and attendance at meetings?

Experiences, Behaviours and Influences; questions to consider:

- Has the pupil encountered peer, social, family or faith group rejection?

- Is there evidence of extremist ideological, political or religious influence on the pupil from within or outside UK?

- Have international events in areas of conflict and civil unrest had a personal impact on the pupil resulting in a noticeable change in behaviour? It is important to recognise that many people may be emotionally affected by the plight of what is happening in areas of conflict (i.e. images of children dying) and it is important to differentiate them from those that sympathise with or support extremist activity

- Has there been a significant shift in the pupil's behaviour or outward appearance that suggests a new social and political or religious influence?

- Has the pupil come into conflict with family over religious beliefs/lifestyle/dress choices?

- Does the pupil vocally support terrorist attacks; either verbally or in their written work?

- Has the pupil witnessed or been the perpetrator/victim of racial or religious hate crime or sectarianism?Travel; questions to consider:

- Is there a pattern of regular or extended travel within the UK, with other evidence to suggest this is for purposes of extremist training or activity?

- Has the pupil travelled for extended periods of time to international locations known to be associated with extremism?

- Has the pupil employed any methods to disguise their true identity? Has the pupil used documents or cover to support this?

Social Factors; questions to consider:

- Does the pupil have experience of poverty, disadvantage, discrimination or social exclusion?

- Does the pupil experience a lack of meaningful employment appropriate to their skills?

- Does the pupil display a lack of affinity or understanding for others, or social isolation from peer groups?

- Does the pupil demonstrate identity conflict and confusion normally associated with youthdevelopment?

- Does the pupil have any learning difficulties/mental health support needs?

- Does the pupil demonstrate a simplistic or flawed understanding of religion or politics?

- Does the pupil have a history of crime, including episodes in prison?

- Is the pupil a foreign national, refugee or awaiting a decision on their immigration/national status?

- Does the pupil have insecure, conflicted or absent family relationships?

- Has the pupil experienced any trauma in their lives, particularly any trauma associated with war or sectarian conflict?

- Is there evidence that a significant adult or other in the pupil's life has extremist view or

sympathies?More critical risk factors could include:

- Being in contact with extremist recruiters

- Articulating support for extremist causes or leaders

- Accessing extremist websites, especially those with a social networking element

- Possessing extremist literature

- Using extremist narratives and a global ideology to explain personal disadvantage •

- Justifying the use ofviolence to solve societal issues

- Joining extremist organisations

- Significant changes to appearance and/or behaviour

16   Related Policies

16.1   Related College policies are published through the College website:

Safer recruitment: this sets out approach taken to required pre-appointment checks and describes how records are maintained. Checks for staff in paid employment will normally include: identity, relevant qualifications, DBS and barred list, right to work in the UK, references, medical, detailed employment history made through an application form. Additional checks are in place for those who have worked overseas and for those working with children under the age of 8 e.g. during any summer school run under the auspices of the College. Appropriate checks are made arising from the requirements of the National Minimum Standards for Boarding Schools, e.g. with regard to adults not members of staff but living on site. All, shortlisted candidates will be subject to online checks.

Anti-bullying: this sets out the College's approach to bullying in all its forms, and notes that bullying which causes or threatens serious harm to a pupil is potentially a child protection matter. Aspects of bullying are noted under child-on-child abuse above.

Pupil behaviour: this sets out the College's expectations for high levels of pupil conduct and describes how the school seeks to achieve these.

Relationship and Sex Education: this sets out the College's response to the statutory guidance on relations, sex and health education.

E-Safety Policy: this aims to ensure that all pupils and staff at Bradfield College use technology in such a way as to protect and promote the welfare of all members of the community, and of the pupils in particular.

Staff behaviour and code of conduct: this provides guidance to staff on how they should conduct themselves in their relationships with pupils and advice on the use of social media.

Acceptable use of IT: this sets out a code of conduct for users of the College's IT systems, which are filtered and monitored centrally.

Whistleblowing: this provides guidance for anyone wishing to draw the attention of the senior leadership, the Headmaster or the governors any problematic feature of safeguarding either in general or with regard to an individual case.

Health and safety and educational trips and visits: these provide guidance to staff on maintaining a safe environment within the College and when taking pupils on external trips and visits.

Wellbeing: including guidance on relationship and sex education through which pupils learn about respectful, positive, safe and healthy relationships and consent.

Appendix A:

Remote Teaching and Pastoral Care & other educational arrangements required in Emergency Circumstances

1.1 In circumstances where a pupil is forced by circumstances to be absent from the College site for protracted period, or in circumstances where the College's operation on site is, either in part or wholly, suspended as a consequence of a national emergency (e.g. epidemic or pandemic infection), the College may offer home tuition and pastoral support to pupils using telephone and on-line resources.

1.2 Before members of staff begin working remotely with pupils, on-line or by telephone, the particular arrangements being developed by the College management team will be risk assessed. The DSL will be responsible for ensuring this Safeguarding Risk Assessment is systematically undertaken and will sign off theRisk Assessment, once it is completed to the DSL's satisfaction. The DSL will also be responsible for regular review of the Risk Assessment in light of on-going experience of remote working. Review of arrangements will take place at least once in each calendar month and be signed off by the DSL. The DSLwill report to governors on the Risk Assessment, and the subsequent operation of the remote arrangements developed in light of it, in her report to the College Pastoral Committee and in her annual Safeguarding report to full Council.

1.3 For the duration of the period when Remote Teaching and Remote Pastoral Care is offered by the College, theDSL or one of her deputies (DDSLs) will be available and contactable by telephone and e-mail. Staff, pupils and parents will be informed that they are free to contact the DSL/DDSLs with any Safeguarding concerns andthat the normal channels for reporting such concerns, in place when the College is in session on site will be maintained. The contact details of the Safeguarding team are set out at the front of this policy document.

1.4 Staff will be informed of the arrangements for remote teaching/pastoral care. This communication will detail the protocols that must be followed by teachers and pastoral staff, as set out belowin this policy document. Staff will be told that they must contact the DSL/DDSLs if there is any aspect of the protocols that they do not understand, or which presents them with insurmountable difficulties.

1.5 Pupils will be informed of the arrangements for remote teaching/pastoral care. This communication willdetail the protocols that must be followed by pupils, as set out below in this policy document.

1.6 Parents will be informed of the arrangements for remote teaching/pastoral care. This communication will detail the protocols that must be followed by teachers and pastoral staff, and also set out the protocols whichmust be followed by pupils. Parents will be told that they must contact the DSL/DDSLs if they become aware that any of these protocols is not being properly followed

1.7 The DSL and other members of the College Senior Management will be able to drop into scheduled on-linelessons and tutorials provided using Microsoft Teams to ensure that the protocols set out below are being appropriately observed by teachers and pupils. They will not be able to access conversations with College Counsellors taking place using Facetime or Zoom.

2   Remote Pastoral Care

2.1 "Remote pastoral care" will primarily entail contact on a weekly basis (in scheduled term-time) aimed to replicate the one-to-one tutorial conversations each pupil has with a tutor when the College is in session. Further pastoral needs may be met by provision that is individually tailored to support a particular pupil. These further provisions will aim to replicate as far as possible the interventions initiated and managed bythe Housemaster/mistress in the normal course of a pupil's boarding education.

2.2 Weekly one-to-one tutorials will last between 15 and 20 minutes as is normative and be provided in linewith these protocols:

2.3 Notes will be kept by the tutor on the Tutor Dashboard on Firefly, in line with normal College procedures.

2.4   No tutorial conversation will last in excess of 20 minutes.

2.5   The tutor will ring the parent to inform them that the tutorials are being set up and agree the means by which the one-to-one conversations will be conducted. The conversations may take place by telephone or by using MS Teams.

2.6   Microsoft Teams is a system provided by the College network. The tutor will always log onto the network using his/her own College Log in. The system will automatically record the date and time of the contact, the name of the recipient, and the duration of the conversation. The tutor's HsM and/or the DSL will periodically review the record of his/her tutorial conversations.

2.7   The following Safeguarding protocols will be followed when tutorials are delivered using Microsoft Teams:

2.8   The teacher will:

- Dress in a professional manner (as if present in the College classroom or on duty in a boarding house);

- Not work one-to-one with a pupil when alone at home (or in a College department) – i.e. the rules requiring a second responsible person to be present when a pupil visits a teacher at their home in Bradfield will apply. (In circumstances where the College is closed and the teacher lives alone and no second responsible person is available, the teacher will invite the HsM to the meeting, so that they will be able to drop into scheduled on-line tutorials as needed.)

2.9   The pupil(s) parents will:

Ensure that their child only participates in on-line face-to-face tutorial when dressed in an appropriate manner (the teacher will terminate the tutorial arrangement immediately *and finally*, if this condition is breached in any way by the pupil);

Ensure that their child engages on-line with the tutor from one of the family rooms at home (kitchen, sitting room etc.).

2.10   In exceptional circumstances, where work in a public space within the home does not constitute a reasonable arrangement, and the child has to engage on-line with the tutor from a private area (e.g. their bedroom at home), the parents may e-mail the tutor to set up special circumstances. They will be formally advised by the tutor, in response, that the College's unconditional and minimum expectation is that the on-line tutorial will *in every case* take place: (a) with the door to the pupil's private area held fully open and (b) on the understanding that the parent(s) will occasionally look into the room, to ensure that the on-line work is proceeding in an appropriate manner. If these supervision arrangements are evidently not fulfilled by the parents, the tutorial arrangement will be terminated immediately by the teacher.

2.11   Telephone tutorials will be available as an alternative to tutorials using MS Teams and will, ideally, be made using a College landline or College mobile phone. The tutor will record the time each tutorial call was made, the number called and the duration of the tutorial conversation. Tutorial phone calls will in every case be made to the number agreed between the tutor and the parents when the tutorial arrangement was initially set up (see [c] above). Weekly, a summary collation of all tutorial telephone calls (time made/number used/duration of call) will be provided to the HsM by each member of the house tutor team.

2.12   If the tutor is self-isolating in the context of epidemic or pandemic infection and has no access to College Teams or a College telephone, the tutor may then use a home telephone or personal mobile, withholding their personal number by using the 141 prefix. When a home/personal phone must be used by the tutor the parents will be asked to send the tutor an e-mail confirming that they agree to this arrangement.

2.13   Tutors will be mindful of the needs of vulnerable pupils and if there are indications of problems developing (for example, as a result of loneliness or anxiety generated by the conditions under which the College has been forced to operate), they will discuss these indications with the pupil's HsM. The HsM may discuss concerns with the pupil's parents. Where appropriate, the pupil's Welfare Plan will be updated by the HsM, in response to identified difficulties, and the Deputy Head (Pastoral) alerted to changing circumstances in the pupil's life.

3   Remote Teaching

3.1   "Remote teaching" will primarily be facilitated by resources posted on the College Firefly system, use of One Note, and through MS Teams. This will include provision/delivery of content and posted assignments.Materials posted will be age-appropriate and reading/film material will be fully reviewed by the teacher before being posted for pupil use. Recorded material will not be shared beyond the Bradfield College on- line community.

3.2   Provision of feedback on work submitted by pupils will be offered in a manner which seeks to replicate (so far as is possible) the feedback provided by teachers when the College is working normally. This includesgeneric group feedback on work (which will be posted on Firefly or OneNote) and specific feedback to individual pupils were a teacher deems this necessary (which will be provided through the above platforms using e-mail, MS Teams or by telephone exchange).

3.3   Face-to-face engagement with pupils will be provided in accordance with these protocols:

3.4   Parents will be informed that provision is being made and the means by which it being delivered will be explained by the College;

3.5   Group tuition may be provided by a teacher using MS Teams. The College will inform the parents before initiating tuition on MS Teams, specifying the likely duration of each of the sessions and the frequency with which they will happen. No group session on MS Teams will last longer than the duration of a College period (i.e. 55 minutes).

3.6   MS Teams is a system provided by the College network. The class teacher will always log onto the network using his/her own College log in. The system will automatically record the date and time of the contact, the names of the recipients, and the duration of the lesson.

3.7   A teacher using MS Teams for individual work will e-mail the parents before the session, specifying its likelyduration. No individual session on MS Teams will last longer than the duration of a College tutorial (i.e. 20 minutes). The teacher will always log onto the network using his/her own College log in. The system will automatically record the date and time of the contact, the name of the recipient, and the duration of the feedback/individual tuition.

3.8   A teacher using the telephone for individual work will e-mail the parents before the session, specifying its likely duration. Telephone contact will ideally be made using a College Landline or College Mobile Phone. If the teacher is self-isolating, however, in the context of epidemic or pandemic infection, and has no accessto a College telephone, (s)he may use a home telephone or personal mobile, withholding their personal number by using the 141 prefix. In circumstances when a home/personal phone must be used by the teacher, the set-up e-mail sent to parents by the teacher will request a response confirming that they agree to the proposed arrangement.

3.9   Feedback/tuition phone calls will in every case be made to a number agreed between the tutor and the parents when the telephone arrangement was initially set up (see [e] above). The teacher will keep a record of the time each call was made, the number called and the duration of the feedback conversation. Weekly, a summary collation of all feedback telephone calls (time made/number used/duration of call) will be providedto the HoD by each member of the department using telephone contact to support pupils' learning.

3.10   Regular and careful vigilance by the Heads of Department and the pupil(s) parents is necessary. Thefollowing safeguarding protocols will be followed:

3.11   The class teacher will inform his/her HoD that they intend to use one-to-one support (by MS Teams ortelephone) to support individual learning. The HoD will keep this information on file.

3.12   When the class teacher e-mails the pupil(s) family(ies) to inform them of planned on- line teaching arrangements, they will offer an *explicit* opportunity for the family to refuse permission for it to happen.

3.13   The-mail from the teacher will formally outline the conditions under which the on- line teaching must take place
and state that the parents' consent to operate according to these rules is required by the College.

3.14   In the course of individual feedback/tuition using MS Teams, the teacher will:

- Dress in a professional manner (as if present in the College classroom or on duty in the boarding house);

- Make a note of the date/time of each session's start and a summary note of its duration and content;

- Not work one-to-one with a pupil when alone at home (or in a College department) – i.e. the rules requiring a second responsible person to be present when a pupil visits a teacher at their home in Bradfield will apply. (In circumstances where the College is closed and the teacher lives aloneand no second responsible person can be available, the teacher will invite the HoD to the meeting, so that they will be able to drop into scheduled on-line tutorials as needed.)

3.15 The pupil(s) parents will:

- Ensure that their child only participates in on-line face-to-face tuition when dressed in an appropriate manner (the teacher will terminate the tuition arrangement immediately *and finally*, if this condition is breached in any way by the pupil);

- Ensure that their child engages on-line with the teacher from one of the family rooms at home (kitchen,sitting room etc.).

3.16 In exceptional circumstances, where work in a public space within the home does not constitute a reasonable arrangement, and the child has to engage on-line with the teacher from a private area (e.g. theirbedroom at home), the parents may e-mail the teacher to set up special circumstances. They will be formally advised by the teacher, in response, that the College's unconditional and minimum expectation is that the on-line tuition will *in every case* take place: (a) with the door to the pupil's private area held fully open and
(b) on the understanding that the parent(s) will occasionally look into the room, to ensure that the on-line work is proceeding in an appropriate manner. If these supervision arrangements are evidently not fulfilled by the parents, the tuition arrangement will be terminated immediately by the teacher.

4   Remote Instrumental Instruction, Voice Coaching, LAMDA & SSSD

4.1   Instrumental and singing tuition, and LAMDA and SSSD lessons (which are in most cases offered one-to- one in normal College routine) may also be offered one-to-one on-line, using Facetime, Zoom or MS Teams.An arrangement can only be set up on receipt of a written request from parents, addressed to the Director of Music, Director of Drama and Head of SSSD and SENCO

4.2   In fulfilling such a request, the College will follow these Safeguarding protocols:

4.3   The Director of Music/Drama/Head of SSSD & SENCO will confer with the pupil's instrumental teacher/voice coach/SSSD teacher (to verify that the tuition will be practicable for the teacher and valuable to the student) and then respond to the parent, agreeing to the request, or asking for further discussion;

4.4   The response will be copied to the Director of Wellbeing who is one of the Deputy DSLs and the parental request will be filed, along with the given response, by Director of Music/Drama/Head of SSSD & SENCO;

4.5   The Director of Music/Drama/Head of SSSD & SENCO's response will include formal outline of the conditions under which the on-line meetings must take place and a statement that the parents must operateaccording to the following Safeguarding arrangements;

4.6   No single on-line session with an instrumental teacher, voice coach, LAMDA or SSSD teacher will last more than the usual lesson time;

4.7   The teacher will:

- Dress in a professional manner (as if present in the College classroom) for any MS Teams, Zoom or Facetime conversation;

- Make a note of the date/time scheduled for each lesson, and send a copy of his planned schedule (whichmay include other pupils at the College) to the Director of Music/Drama

/Head of SSSD & SENCO (including a summary note of the content of each lesson), at the end of each day;

- Not work one-to-one with a pupil when alone at home (or in the College Music School/ Drama or SSSD department) – i.e. the rules requiring a second responsible person to be present when a pupil visits a teacherat their home in Bradfield will apply. (In circumstances where the College is closed and the teacher lives alone and no second responsible person can be present, the teacher will invite a colleague from Bradfield to the meeting, so that they will be able to drop into scheduled on-line tutorials as needed).

4.8   The pupil(s) parents will [as part of their agreement to allow face-to-face working on-line] will undertake tooffer reasonable supervision of their child during the period of face-to-face work on-line.

4.9   Where music/LAMDA/SSSD tuition in a public space within the home does not constitute a reasonable arrangement, and the child has to engage on-line with the teacher from a private area (e.g. their bedroom at home), the parents may e-mail the teacher to set up special circumstances. They will be formally advised by the teacher, in response, that the College's unconditional and minimum expectation is that the on-line tuition will *in every case* take place: (a) with the door to the pupil's private area held fully open and (b) on the understanding that the parent(s) will occasionally look into the room, to ensure that the on-line work is proceeding in an appropriate manner. If these supervision arrangements are evidently not fulfilled by the parents, the tuition arrangement will be terminated immediately by the teacher.

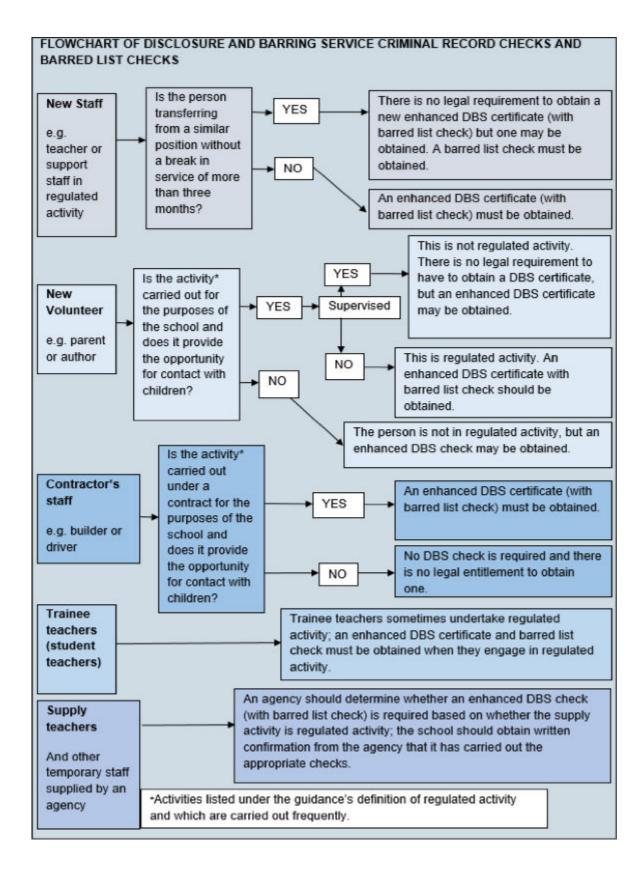
5   Remote Pastoral Support: Counselling

5.1   Established professional counselling (which is in normal operating circumstances routinely offered one-to- one, unsupervised at the College) may continue on-line, using Facetime, Zoom or Microsoft Teams, on receipt of a written request from a child's parents, the pupil, or from the professional counsellor. The request will be addressed to the Designated Safeguarding Lead. If made by the counsellor, it need not name the pupil directly (XY of A/B House will be sufficient) but the request must contain a clear statement explainingwhy on-going support of the pupil is important.

5.2   In deciding to agree such a request, the College will require these safeguarding protocols to be in place:

5.3   The DSL will determine if the support requested will be practicable for the provider and valuable to the student and file the response

5.4   The DSL will formally outline the conditions under which the on-line meetings must take place

5.5   No single counselling session will last in excess of 60 minutes.

5.6   The counsellor will:

- Dress in a professional manner (as if present in the College counselling room) for any MS Teams, Zoom or Facetime conversation;

- Make a note of the date/time scheduled for each session, and send a copy of his planned schedule to the Deputy Head (Pastoral) by the end of the day;

- Not work one-to-one with a pupil when alone at home. The rules requiring a second responsible person to be present in the home when a pupil visits a teacher at home in Bradfield will apply. (In circumstances where the counsellor providing pastoral support lives alone and no second person can bepresent in the home during the counselling session, the support will not available unless the explicit permission of the pupil's parent is provided);

5.7   The child will:

- only be permitted to participate in on-line face-to-face pastoral conversation if dressed in an appropriate manner, and the counsellor will terminate the support arrangement immediately *and finally,* if this protocolis breached in any way;

- be required to formally confirm at the start of any session that they are not alone in the home, and the counsellor will formally record that this affirmation has been made.

5.8   If any of these arrangements are evidently not fulfilled by the pupil, the counselling support will beterminated immediately by the counsellor.

6   Particular Safeguarding Issues

6.1   Promoting Wellbeing: Remote teaching and pastoral care creates significant challenges for those workingalone at home, both staff and pupils.

6.2   It is important that individuals do not spend too much time sitting in front of a computer screen without a break and the College recommends that breaks are taken in a manner which replicates the normal rhythms ofa school day.

6.3   Individuals need to be mindful of the need for good posture at workstations and it is strongly recommended that laptops are placed on a desk or table, and not worked at for long periods resting on the lap or knee.

6.4   Isolation can place stains on mental and physical health. It is important that everyone takes regular dailyexercise of some sort and that they seek social interaction, either with families at home on online.

6.5   On-line Bullying: Both teachers and pupils need to bear in mind that bullying can happen as easily on-line as it can in physical form.

6.6   Everyone needs to re-read the Acceptable Use Agreement and the Anti-bullying policy, available on the website, to make sure that they do not slip into behaviour that might be felt to be bullying in character. Unkindness on-line cannot be excused as "teasing or "banter" and everyone has to be sensitive to their audience when writing or posting material.

6.7   Pupils who feel that they have been subject to on-line bullying of any sort should report it immediately totheir Housemaster/mistress in the expectation that the issue will be taken very seriously.

6.8   The College is mindful that some on-line bullying amounts to on-line abuse and will deal with behaviour thatpotentially constitutes abuse in line with the provision outlines earlier in this policy document.

6.9   Disciplinary Arrangements: The disciplinary structures of the College will remain operative during any period of Remote Teaching/Pastoral Care.

6.10   Expectations of behaviour are outlined in the College Behaviour Policy and the sanctions associated withpoor behaviour are also set out in the document.

6.11   Pupils must be clear that on-line misbehaviour will be addressed in exactly the same way if initiated from a pupil's home as it would be if the misbehaviour were to take place at the College.

6.12   Reporting of Safeguarding Concerns: The system for reporting Safeguarding concerns, disclosures and allegations of abuse do not change when the College is working remotely. Either the DSL or one of her deputies will be on duty 24/7 in term-time and those wishing to make a report or discuss a concern mustnot hesitate to make contact.

Appendix B
HR Checking Procedures for DBS and Barred List Service

FLOWCHART OF DISCLOSURE AND BARRING SERVICE CRIMINAL RECORD CHECKS AND BARRED LIST CHECKS

New Staff

e.g. teacher or support staff in regulated activity

Is the person transferring from a similar position without a break in service of more than three months?

→ YES → There is no legal requirement to obtain a new enhanced DBS certificate (with barred list check) but one may be obtained. A barred list check must be obtained.

→ NO → An enhanced DBS certificate (with barred list check) must be obtained.

New Volunteer

e.g. parent or author

Is the activity* carried out for the purposes of the school and does it provide the opportunity for contact with children?

→ YES → Supervised → YES → This is not regulated activity. There is no legal requirement to have to obtain a DBS certificate, but an enhanced DBS certificate may be obtained.

Supervised → NO → This is regulated activity. An enhanced DBS certificate with barred list check should be obtained.

→ NO → The person is not in regulated activity, but an enhanced DBS check may be obtained.

Contractor's staff

e.g. builder or driver

Is the activity* carried out under a contract for the purposes of the school and does it provide the opportunity for contact with children?

→ YES → An enhanced DBS certificate (with barred list check) must be obtained.

→ NO → No DBS check is required and there is no legal entitlement to obtain one.

Trainee teachers (student teachers)

Trainee teachers sometimes undertake regulated activity; an enhanced DBS certificate and barred list check must be obtained when they engage in regulated activity.

Supply teachers

And other temporary staff supplied by an agency

An agency should determine whether an enhanced DBS check (with barred list check) is required based on whether the supply activity is regulated activity; the school should obtain written confirmation from the agency that it has carried out the appropriate checks.

*Activities listed under the guidance's definition of regulated activity and which are carried out frequently.

Reporting Low-Level Staff Concerns policy

Contents:

1. Statement of intent
2. Legal framework
3. Definitions
4. Roles and responsibilities
5. Prevention amongst staff
6. Reporting concerns
7. Self-reporting
8. Evaluating concerns
9. Acting on concerns
10. Record keeping
11. Monitoring and review

The purpose of a Low-Level Concerns policy is to create and embed a culture of openness, trust and transparency, in which the clear values and expected behaviour which are encapsulated in the Staff Code of Conduct are constantly lived, monitored and reinforced by all staff.

There are no inhibitions placed by GDPR on sharing, **within** the College organisation, information intended to safeguard children and young people. Communication of such data related to allegations against staff **beyond** the organisation should however be treated with care and take place only with the explicit sanction of the Headmaster, who will keep the DSL informed, or in response to a police investigation. The data at issue will always be held in the context of the Safeguarding tracker filing system and will be disposed of once it is no longer necessary in pursuit of the safeguarding purposes for which it was collated. Additionally, the recorded data will always make clear when it is a record of factual information or if the record is simply of hearsay, suspicion or opinion.

1. Statement of intent

Bradfield College understands the importance of acknowledging, recording and reporting all safeguarding concerns, regardless of their perceived severity. We understand that, while a concern may be low-level, that concern can escalate over time to become much more serious.

Our school prides itself on creating a safe and happy environment for pupils, and our staff are expected to adhere to high standards of behaviour when it comes to professional conduct regarding pupils. The school has clear professional boundaries which all staff are made aware of and will adhere to. We are committed to ensuring that any safeguarding concerns are dealt with as soon as they arise and before they have had a chance to become more severe, to minimise the risk of harm posed to our pupils and other children.

Any safeguarding or child protection concern however low-level about the conduct of a member of staff, governor, contractor, volunteer or visitor towards a pupil must be reported to the Headmaster unless the concern is about the Headmaster himself, in which case the Warden should be informed, in all cases without informing the person against whom the allegation is made. The Headmaster may delegate the matter to the DSL or a member of her team.

All other safeguarding and child protection matters including child-on-child abuse should be referred to the DSL or a member of her team.

Anyone may make a referral about an allegation directly to the local children's services or if criminal activity is involved to the police. In such cases, the person making the referral is asked to report their referral to the Headmaster or Warden as appropriate as soon as possible.

2. Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following;

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- DfE (2023) 'Keeping children safe in education 2023'
- DfE (2018) 'Working Together to Safeguard Children'
- DfE (2019) 'Relationships and sex education (RSE) and health education'

This policy operates in conjunction with the following school policies:

- Child Protection and Safeguarding Policy
- Staff Code of Conduct
- Whistleblowing Policy
- Equality and Diversity Policy
- Behaviour Policy
- Data Protection Policy
- RSE Policy

3. Definitions

For the purposes of this policy, a low-level concern is defined as any concern had about an adult's behaviour towards, or concerning, a child that does not meet the harms threshold (see below), or is otherwise not serious enough to consider a referral at the time of its reporting. Low-level concerns refer to behaviour on the part of a staff member, volunteer, contractor, governor, or visitor towards pupils that is considered inappropriate in line with statutory safeguarding advice, the Staff Code of Conduct, and the appropriate and inappropriate behaviour subsection of this policy.

Low-level concerns are differentiated from concerns that can cause harm. The harms threshold is the point at which a concern is no longer low-level and constitutes a threat of harm to a child. This threshold is defined as accusations that an adult has:

- 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 in a way that indicates they may pose a risk of harm to children.
- Behaved in a way that indicates they may not be suitable to work with children, including behaviour that has happened outside of school.

While low-level concerns are, by their nature, less serious than concerns which meet the harms threshold, the school understands that many serious safeguarding concerns, e.g. child sexual abuse, often begin with low-level concerns, e.g. being overly friendly with children. The school will ensure that all staff are aware of the importance of recognising concerns before they escalate from low-level to serious, wherever possible.

The Headmaster may liaise with the DSL on specific low-level concerns and delegate their resolution to her or a member of her team.

4. Roles and responsibilities

The Governing board is responsible for:
- Ensuring that the school complies with its duties under child protection and safeguarding legislation.
- Ensuring that policies, procedures and training opportunities with regard to reporting safeguarding concerns are compliant and effective.
- Guaranteeing that there is an effective Staff Code of Conduct that outlines behavioural expectations.
- Ensuring that a suitably trained DSL has been appointed, alongside deputy DSLs where appropriate.
- Ensuring that there are robust reporting arrangements, including inter-agency collaboration.
- Ensuring that there are appropriate procedures in place to handle allegations and low-level concerns reported against members of staff.

The Headmaster, liaising as appropriate with the DSL, is responsible for:

- Being the point of contact for all staff when they have safeguarding concerns or other about the conduct of a member of staff or other working or volunteering onsite, whether serious or low-level. The Headmaster may refer the member of staff to the DSL or a member of her team.
- Assessing whether safeguarding concerns about staff members meet the threshold for being termed an allegation, or whether they are low-level concerns.
- Implementing this policy, and all related policies, throughout the school, and ensuring that staff adhere to it at all times.
- Safeguarding pupils' wellbeing and maintaining public trust in the teaching profession.
- Ensuring via the DSL and her team that all staff have undertaken safeguarding training.
- Ensuring via the DSL and her team that all staff have an ongoing awareness of low-level concerns and reporting procedures.
- Maintaining with the DSL as appropriate detailed, accurate and secure records of all low-level concerns and any actions taken.

The DSL is responsible for:

- Assisting the Headmaster as required in assessing whether safeguarding concerns about staff members meet the threshold for being termed an allegation, or whether they are low-level concerns.
- Following all procedures outlined in this policy for assisting the Headmaster as required in acting upon low-level concerns.
- Liaising as required and appropriate with the Headmaster, staff members, the governing board and all relevant agencies to act upon concerns, where necessary.

Staff are responsible for:

- Adhering to all the relevant policies and procedures, including acting within the Staff Code of Conduct at all times.
- Interacting with pupils in a way that is respectful and appropriate for their level of authority and has due regard to the power imbalance between pupils and staff members.
- Understanding the importance of reporting low-level safeguarding concerns.
- Reporting any and all safeguarding concerns they may have about pupils immediately.
- Reporting any and all safeguarding concerns they may have about the behaviour of a member of staff or other adult working or volunteering onsite immediately.

5. Prevention amongst staff

5.1 Appropriate and inappropriate behaviour

The school will ensure that all staff members are aware of the standards of appropriate behaviour expected towards pupils.

Staff will ensure that they pay due regard to the fact that:
- They are in a unique position of trust, care, responsibility, authority and influence in relation to pupils.
- There is a significant power imbalance in the pupil-staff dynamic.
- There are more stringent expectations on their behaviour with regard to pupils due to their position as a public professional.

Staff will remain aware of the fact that all pupils under the age of 18, regardless of the phase and year group they are at within the school, are children by law – resultantly, staff will ensure that they do not assume maturity on behalf of a pupil and do not engage with pupils as they would with their own peers. Staff will be aware that where there is any doubt regarding whether the behaviour of another adult is appropriate, this should be reported to the Headmaster immediately who may liaise with the DSL.

Inappropriate behaviour can exist on a wide spectrum, from inadvertent or thoughtless behaviour to behaviour which is ultimately intended to enable abuse. Examples of inappropriate behaviour that would constitute a low-level concern that should be reported to the Headmaster include:

- Being overly friendly with children – this could include, but is not limited to, communicating with a child through personal social media or allowing inappropriate conversations or enquiries to occur with pupils, e.g. conversations that are about a staff member's personal life or are of a sexual nature.
- Having favourites – this could include, but is not limited to, calling pupils by pet names or terms of endearment or buying pupils gifts.
- Taking photographs of children on their personal mobile phones or devices.
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
- Using inappropriate, sexualised, intimidating or offensive language.

Staff will be aware that some of the above low-level concerns may meet the harms threshold depending on certain factors, e.g. the age or needs of the child or the content of exchanged messages, and that some of the above incidents may not be concerns in context, e.g. a pre- approved, one-to-one meeting with a child behind a closed door between the child and a school counsellor who has received all appropriate safety checks. It is for the Headmaster and not individual members of staff to determine whether or not the harms threshold is reached in any individual case.

Staff will also be made aware that behaviour which raises concerns may not be intentionally inappropriate, and that this does not negate the need to report the behaviour. Staff members who engage in low-level inappropriate behaviour in relation to pupils inadvertently will be made aware and supported correct this behaviour in line with the Staff Code of Conduct. The Headmaster will also evaluate whether additional training would be beneficial for any staff members exhibiting concerning behaviour, or the staff cohort as a whole where low-level concerning behaviour is seen more widely.

5.2 School culture

The school understands that spotting the early signs of harmful behaviour towards children can be difficult, and that many will be hesitant to report concerns they have about their colleagues' behaviour, particularly the behaviour of their superiors. Staff are encouraged to maintain an attitude that recognises that abuse can happen anywhere, in any setting, and that anyone can be a perpetrator regardless of their age, sex, level of authority, personality, etc.

The school will ensure that all staff members have received training as part of their induction that outlines appropriate behaviour towards pupils for staff members. All staff will read, understand and adhere to the *Appropriate and inappropriate behaviour* subsection of this policy, as well as the Staff Code of Conduct.

Staff will address any general questions they have regarding safeguarding to the DSL. The school will work to foster an environment where personal and professional boundaries are clearly set and respected for all individuals in the school community, e.g. pupils are not treated as friends and an appropriate professional distance is maintained by staff.

The school will ensure that all staff are sufficiently trained surrounding the reporting of safeguarding concerns as part of their induction, and that refresher training is conducted as necessary. The school will ensure that all staff understand how to recognise and report safeguarding concerns. Staff will be trained to identify concerning or problematic behaviour towards pupils that may indicate a safeguarding concern, and how to identify signs of abuse or harm in pupils.

5.3 Evaluating school culture following concerns

The school will ensure that appropriate consideration is given to the school's culture and whether or not it has enabled the inappropriate behaviour to occur. The Headmaster will review whether any changes need to be made to relevant policies or training programmes in light of any evaluations of the school's culture, in order to achieve an open and transparent culture that deals with all concerns promptly and appropriately.

6. Reporting concerns

The school will promote a culture in which safeguarding pupils is the uppermost priority, beyond any perceived professional loyalties to colleagues, ensuring that staff are actively encouraged to report concerns, regardless of their relationship with the staff member. Staff will report all safeguarding concerns relating to members of staff which they have to the Headmaster immediately in line with the procedures laid out in the Child Protection and Safeguarding Policy. Staff members will report concerns without undue delay. Where the report concerns a specific incident, staff members will report their concerns no later than 24 hours after the incident where possible. Staff members will be aware that concerns are still worth reporting even if they do not seem serious.

Staff members will report their concerns to the Headmaster orally, or via email. When submitting concerns, staff will take care to ensure that they observe the Confidentiality Policy, and protect the identity of all individuals to which the concern pertains as far as possible.

Staff members may request anonymity when reporting a concern, and the school will endeavour to respect this as far as possible. The school will not, however, promise anonymity to staff members who report concerns in case the situation arises where they must be named, e.g. where it is necessary for a fair disciplinary hearing. In line with the Whistleblowing Policy, staff will be protected from potential repercussions caused by reporting a genuine concern. However, as noted above, the Headmaster may involve the DSL in the matter.

Where a low-level concern relates to the Headmaster, it should be reported to the Warden.

Where a low-level concern relates to a person employed by a supply agency or a contractor to work in the school, staff will also be required to report this to the Headmaster, who will, in turn, inform the employer of the subject of the concern.

7. Self-reporting

On occasion, a member of staff may feel as though they have acted in a way that:
- Could be misinterpreted.
- Could appear compromising to others.
- They realise, upon reflection, falls below the standards set out in the Staff Code of Conduct.

The school will ensure that an environment is maintained that encourages staff members to self-report if they feel as though they have acted inappropriately or in a way that could be construed as inappropriate upon reflection. The Headmaster and where appropriate DSL will, to the best of their abilities, maintain a culture of approachability for staff members, and will be understanding and sensitive towards those who self-report.

Staff members who self-report will not be treated more favourably during any resulting investigations than staff members who were reported by someone else; however, their self-awareness and intentions will be taken into consideration.

8. Evaluating concerns

Where the Headmaster is notified of a safeguarding concern, they will use their professional judgement to determine if the concern is low-level or if it must be immediately escalated, e.g. where a child is at immediate risk of harm. When deciding if a concern is low-level, the Headmaster will discuss the concern with the DSL, and will seek advice from external agencies where there is any doubt about how seriously to take the concern. When seeking external advice, the Headmaster will ensure they adhere to the Data Protection Policy, and the information sharing principles outlined in the Child Protection and Safeguarding Policy, at all times.

To evaluate a concern, the Headmaster and where appropriate DSL will:
- Speak to the individual who raised the concern to determine the facts and obtain any relevant additional information.
- Review the information and determine whether the behaviour displayed by the individual about whom the concern was reported is consistent with the Staff Code of Conduct and the law.

- Determine whether the concern, when considered alongside any other low-level concerns previously made about the same individual, should be reclassified as an allegation and dealt with alongside the Allegations of Abuse Against Staff Policy.
- Consult with, and seek advice from, external agencies when in doubt over the course of action to follow.
- Speak to the individual about whom the concern has been raised to inform them of the concern and to give them an opportunity to respond to it.
- Ensure that accurate and detailed records are kept of all internal and external conversations regarding evaluating the concern, and any actions or decisions taken.

9. Acting on concerns

9.1 Where the concern is unfounded

If it is discovered upon evaluation that the low-level concern refers to behaviour that was not considered to be in breach of the Staff Code of Conduct and the law, the Headmaster will speak to the individual about whom the concern was made to discuss their behaviour, why and how the behaviour may have been misconstrued, and what they can do to avoid such misunderstandings in the future. The Headmaster will also speak to the individual who shared the concern, outlining why the behaviour reported is consistent with school standards and the law. The Headmaster will take care to ensure that conversations with individuals who reported concerns that transpired to be unfounded do not deter that individual from reporting concerns in the future.

The Headmaster will discuss the concern with the DSL to discern whether the behaviour, and the reporting of this behaviour, is indicative of ambiguity in the school's policies or procedures, or the training it offers to staff. Where such ambiguity is found, the DSL and Headmaster will work together to resolve this with input from other staff members, as necessary.

9.2 Where the concern is low-level

Where the Headmaster determines that a concern is low-level, the school will respond to this in a sensitive and proportionate manner. The following procedure will be followed:

- The DSL where appropriate holds a meeting with the individual about whom the concern was reported, during which they will:
  - Talk to the individual in a non-accusatory and sympathetic manner.
  - Inform them of how their behaviour was perceived by the individual who reported the concern (without naming them, where possible).
  - Clearly state what about their behaviour was inappropriate and problematic.
  - Discuss the reasons for the behaviour with the individual.
  - Inform the individual clearly what about their behaviour needs to change.
  - Discuss any support that the individual may require in order to achieve the proper standards of behaviour.
  - Allow the individual the opportunity to respond to the concern in their own words.
- The DSL asks the individual to re-read the Staff Code of Conduct.
- The DSL and the Headmaster will consider whether the individual should receive guidance, supervision or any further training.
- Where considered appropriate in the circumstances, the Headmaster will develop an action plan, with input from the individual, that outlines ongoing and transparent monitoring of the individual's behaviour and any other support measures implemented to ensure the staff member's behaviour improves.
- Where it is necessary to undergo an investigation into the behaviour, this will be done discreetly, and information will only be disclosed to individuals on a need-to-know basis.
- Where any pupil or other individual has been made to feel uncomfortable by the individual's behaviour, they will be offered pastoral support, where appropriate.

The Headmaster will ensure that all details of the low-level concern, including any resultant actions taken, are recorded and securely stored in line with the Data Protection Policy. The Headmaster will ensure that these records

are kept organised and up-to-date and ensure that the DSL is kept informed as appropriate, and that it is easy to refer back to these records if any other concerns are reported about the same individual.

The specific approach to handling low-level concerns will be adapted on a case-by-case basis. It is unlikely that a low-level concern will result in disciplinary procedures; however, individuals may be given warnings in line with the Disciplinary Policy where behaviour does not improve once it is brought to their attention. Where behaviour does not improve over a longer period of time, the concerns will be escalated and dealt with in line with the Safeguarding and Child Protection policy.

9.3 Where the concern is serious

The Headmaster may decide upon evaluation that a concern is more serious than the reporter originally thought, e.g. when viewed in conjunction with other evidence or other concerns made about the same individual. Where this decision is made, the concern will be escalated, and dealt with as an allegation. The Headmaster will then follow the procedures laid out in the Safeguarding and Child Protection policy.

10. Record keeping

The school will retain all records of low-level concerns, including those that were found to be unfounded. The Headmaster will ensure that all records include the most accurate and up to-date information and will store them in the electronic low-level concerns file. The Headmaster with the assistance where appropriate of the DSL, will ensure that all low-level concerns are stored together, in an organised and consistent manner, to ensure they can be easily reviewed and analysed where necessary.
Records will include:
- A clear and comprehensive summary of the concern.
- Details of how the concern was followed up and resolved.
- A note of any action taken, decisions reached, and the outcome.
- The name of the individual sharing concerns – if the individual wishes to remain anonymous, this will be respected as far as reasonably possible.

The DSL liaising with the Headmaster will periodically review the recent low-level concerns made to ensure that they are being appropriately dealt with and to check for any concerning behaviour patterns amongst the staff cohort as a whole. The DSL will keep records of these reviews and report on any low- level concerns will be submitted termly to the Governors at the Pastoral Committee.

Where any concerning patterns of behaviour have been identified with regard to a member of staff, the DSL will consult with the Headmaster to decide on a course of action. Where a pattern of behaviour has become so concerning that it meets the harms threshold, this will be referred to the LADO as soon as practicable.
Records of low-level concerns will not be kept in the personnel file of the individuals to whom the concerns pertain, unless there have been multiple low-level concerns made about the same individual. Where a concern is thought to be serious and is processed as an allegation, records of this will be kept in staff personnel files. Where multiple low-level concerns have been made about the same individual, these will be kept together, and in chronological order.

Where an allegation is made about an individual who has previously been subject to such allegations, or where a low-level concern is reclassified as a serious concern after meeting the harms threshold, all records of low-level concerns about that individual will be moved to the staff personnel file and kept alongside records of the allegation.

The school will only refer to concerns about a staff member in employment references where they have amounted to a substantiated safeguarding allegation, i.e. it has met the harms threshold and has been found to have basis through investigation, or where it is not exclusively a safeguarding issue and forms part of an issue that would normally be included in a reference, e.g. misconduct or poor performance. Low-level safeguarding concerns will
not be included in a reference, unless they have comprised a pattern of behaviour that has
met the harms threshold.

11. Monitoring and review

This policy will be reviewed annually by the Headmaster and DSL, and in response to any new safeguarding requirements or concerns surrounding the wider cultural issues in the school. The next scheduled review for this policy is July 2024.

SRD
July 2023