

## CHILD PROTECTION (SAFEGUARDING) POLICY

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## CHILD PROTECTION (SAFEGUARDING) POLICY

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Advised by: Andrew Hall

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Name of Local Safeguarding Board (LSCB)

West Berks LSCB, West Street House, West Street, Newbury, Berkshire, RG14 1BZ

West Berks Children and Social Care Services: Council Offices, West Street House, Newbury. 01635 503090

Debi Miles: Children's Services Service Manager / LADO 01635 519093

Karen Pottinger — PEWO/LADO (Schools)/Lead Safeguarding (Educ)

Phone: Referral via West Berkshire's R&A Team - 01635 503090

Contact details for LADO (allegations against staff in schools): Karen Pottinger 07796 551863

Contact details for advice and support about extremism:

PC Tim Emery, Police Constable 1570, Safer Schools Partnership Offer, West Berkshire Police Area, Newbury Police Station, Mill Lane, Newbury, Berks, RG14 5QU Tel: 07800 702 417 (for Police & Partner Agencies) or 101 the DfE dedicated telephone helpline and mailbox for non-emergency advice for staff and governors : 020 7340 7264 and [counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk)).

Contact details for reporting FGM to local police: Telephone 101

NB Named contacts may change, but phone numbers less often. Every effort is made to maintain the most up-to-date contact details but even if a person has left, the phone number should still connect to the appropriate new member of staff. Ask for the person listed above and you will be helped if they are not available.

## CHILD PROTECTION (SAFEGUARDING) POLICY

### A. Policy Statement

At Newbury Hall 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 concerns seriously and encourage children and young people to talk to us about anything that worries them. We will always act in the best interest of the child.

At Newbury Hall students following a full-time education are taught about safeguarding, including online, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum.

Newbury Hall fully recognises its responsibilities and statutory duties for safeguarding children from risk of or actual abuse and in promoting the welfare of children. It is also recognised that 'safeguarding children and protecting them from harm is everyone's responsibility, the best interests of the child are paramount'. Keeping Children Safe in Education, September 2016' is the current DfE guidance upon which this policy is based. This policy seeks to give clear direction to staff and others about expected behaviour when dealing with child protection issues, through good practice and sound procedures. Child protection concerns, referrals and monitoring should be handled sensitively, professionally and in ways that support the needs of the child. The welfare of the child is paramount. Children Act 1989.

Newbury Hall has a statutory and moral duty to ensure that the School safeguards, protects and promotes the welfare of children, young people and vulnerable adults and staff members. (In this document they will sometimes be referred to as people/persons). To this effect, all staff directly employed by Newbury Hall are subject to Disclosure and Barring Service (DBS) checks and other checks as required. Staff are required to work within the Guidelines on Setting and Maintaining Professional Boundaries detailed in Annex A (see page 21).

This policy is available on the school website and is also available in hard copy for parents and prospective parents upon request.

In this document, the term 'children and young people' is used to mean 'those under the age of 18'.

The Proprietor is committed to ensuring that the School:

- provides a safe environment for all people in which to learn or work
- identifies children in need or who are suffering, or likely to suffer, significant harm, and takes appropriate action to see that such children are kept safe, both at home and at the School.

In pursuit of these aims, the Proprietor will approve and annually review policies and procedures with the aim of:

- raising awareness of issues relating to welfare and safeguarding and the promotion of welfare by providing a safe environment for everyone within the School community
- aiding the identification of people at risk of significant harm, and providing procedures for reporting without delay
- concerns establishing procedures for reporting and dealing with allegations of abuse against members of staff without delay
- the safe recruitment of staff ensuring DBS and other required checks are in place and recorded as required on the Single Central Register (SCR)
- working in partnership with all relevant agencies to safeguard the welfare of children and young people and to act in law for all individuals.

In developing the policies and procedures, the Proprietor will consult with, and take account of, guidance issued by the relevant government department and other relevant bodies and groups.

The School will refer concerns that a person might be at risk of significant harm to Social Care Service/the Police/the appropriate agencies as agreed with West Berkshire Local Safeguarding Children Board, if applicable.

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On appointment, all staff are made aware of the School's commitment to safeguarding children and are briefed on their safeguarding duties and this policy.

They will be issued with a copy of Annex A 'Guidelines on Setting and Maintaining Professional Boundaries' and agree to training. Induction training includes the school's whistleblowing policy and procedures, the identity of the DSL and Deputy DSL, a copy of KSIE 2016 Part 1

The DSL, Jon Crocker, is the designated senior member of the Leadership Team with lead responsibility for student related issues.

The Proprietor will receive from the designated senior member of staff with lead responsibility for safeguarding (students and staff) an annual report which reviews how the duties have been discharged.

The Proprietor will hold termly meetings with the Principal. The Proprietor will analyse and review safeguarding records and data on a monthly basis and review the findings with the Principal.

The confidentiality of individuals will be maintained – the proprietor is monitoring the effectiveness of the school's policy and its implementation.

### **Safeguarding Information for Students**

The School is committed to ensuring that students are aware of any behaviour that is not acceptable and how they can keep themselves safe. All students are informed that we have a senior member of staff with responsibility for safeguarding. Students will be informed during induction and reminded during tutorials and one-to-one interviews.

Posters with safeguarding contact information will be displayed prominently in the school and residence. PSHE will also address issues surrounding how students might keep themselves safe.

The Safer Schools Police Liaison Officer will conduct his yearly visit to the school to talk to students about personal and online safety.

We inform students who they can talk to, both in and out of School, their right to be listened to and heard and what steps can be taken to protect them from harm.

Students are made aware of these arrangements through individual tutorials and feedback interviews. Students will also receive a visit from the school's appointed independent listener and be allocated a named tutor.

Newbury Hall will provide a counsellor for students when required.

We will share with parents/carers/supporters/relevant agencies any concerns we may have about their child, unless this may place a child at risk of harm or the young person has exercised their right to confidentiality.

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### B. Designated Staff with Responsibility for Safeguarding

Designated Safeguarding Lead: Jon Crocker

Please refer to the latest version of KCSIE 2016

Responsible for:

- overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agencies as agreed with Local Safeguarding Children Board; monitoring and taking action
- providing advice and support to other staff on issues relating to safeguarding including children in need and early intervention
- maintaining a proper record of any referral, complaint or concern (even where that concern does not lead to a referral)
- ensuring that parents/carers/guardians of children and young people are aware of the School policy. The policy will be available on the website and available in hard copy for parents and guardians
- liaising with the LEA and the Local Safeguarding Children Board and other appropriate agencies
- ensuring that staff receive basic training, regular updates and refresher courses every three years in safeguarding issues and are aware of the School safeguarding procedures
- provide an annual report to the Proprietor setting out how the School has discharged its duties to students and staff.
- leading on internal monitoring meetings with the safeguarding team.
- reporting deficiencies in procedure or policy identified by the Local Safeguarding Children Board (or others) to the Proprietor at the earliest opportunity.
- The Designated Safeguarding Lead may delegate duties to members of the Safeguarding Team.

Safeguarding Team: Ben Crompton - Charlene Lepeck - Emma Swain

Responsible for:

- reporting to the Designated Safeguarding Lead
- will know how to make an appropriate referral and act on behalf of the Designated Safeguarding Lead
- will be available to provide advice and support to other staff on issues relating to safeguarding
- have particular responsibility to be available to listen to people studying and working at the School
- will deal with individual cases, including attending case conferences and review meetings as appropriate.
- will receive training in safeguarding issues and inter-agency working, as required by the Local Safeguarding Children Board, and will receive refresher training at least every 3 years. To include the risks of radicalisation and how to identify children and young people at risk.

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### C. Duties of all Staff

#### **Staff Code of Conduct**

All staff must maintain proper and professional relationships and behave responsibly at all times to safeguard themselves and their students. All staff are required to adhere to the School guidelines on setting and maintaining professional boundaries (Annex A of this Policy see page 21) which provides practical advice on how to work effectively and safely with students and to successfully complete mandatory training every year.

#### **Information Sharing and Confidentiality**

Child Protection information is shared only on a need to know basis. However it is important to understand that staff have a duty to share information where that information will help to inform the Social Care Service or Police enquiries. Remember! The person's needs are paramount and where staff have concerns about a person they must share their concern through the safeguarding procedures. The Data Protection Act does not prevent information sharing with investigating agencies where the information will help to safeguard welfare.

#### **What if a person tells you they are being abused?**

Take them seriously; it will have taken a lot of courage to tell someone. Reassure them that they have done the right thing in telling someone. Do not promise to keep what they tell you a secret; if the person asks you to, tell them that you may have to tell someone to get further help and to keep them safe. Thank them for telling you and follow the procedures set out in Annex B and C

A bullying incident will be treated as a child protection concern when there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm', and action will be taken in accordance with Newbury Hall's Anti-Bullying Policy.

Please refer to our anti-bullying and anti cyberbullying policies available on our website or on request.

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### D. Dealing with Disclosure of Abuse and Procedure for Reporting Concerns

All staff, whether contracted, directly employed or voluntary, have a duty to discuss immediately with designated staff any knowledge, suspicion or concerns that someone is being abused. Staff can make a direct referral to children's services but where possible should discuss with designated staff. The designated lead must be informed of all referrals. If after a referral the situation does not seem to be improving the designated lead will press for re-consideration until the safeguarding team is satisfied that the situation is being appropriately managed.

All staff and volunteers are required to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and such concerns will be taken seriously by the senior leadership team. A whistleblowing disclosure must be about something that affects the general public such as:

- a criminal offence has been committed, is being committed or is likely to be committed
- an legal obligation has been breached
- there has been a miscarriage of justice
- the health or safety of any individual has been endangered
- the environment has been damaged
- information about any of the above has been concealed.

The NSPCC runs a whistleblowing helpline on behalf of the Home Office, the number is 0808 800 5000.  
(please refer to our whistleblowing policy)

#### **What if you suspect someone is being abused?**

It is not your concern to establish whether or not they are telling the truth. It is your job to pass on your concerns.

Where applicable, child protection procedures need to be operated at the point of concern; it is not your job to investigate. Contact a Designated Member of Staff immediately.

#### **Record Keeping**

Make sure that you make a written record of your concern and how you dealt with it (preferably on Annex B see page 21). Records should be made as soon as possible and every possible effort should be made to record precisely what was said along with the context. Sign and date the record. The Designated Member of Staff will advise, ensure action is immediately taken in accordance with the school's safeguarding policy and procedures including safe storage of the safeguarding records. Records may be used in court.

Staff must not investigate concerns or allegations themselves, but must report them immediately to a Designated Member of Staff.

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### E. Reporting and Dealing with Allegations of Abuse against Members of Staff

These procedures apply to all staff, whether teaching, administrative, management or support, as well as to volunteers and agency workers. The word 'staff' is used for ease of description.

Staff of education institutions may have allegations of abuse made against them, we recognise that an allegation of abuse may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation refer immediately to the LADO, maintaining an open mind and that information gathering as agreed with the LADO is not subject to delay.

Those dealing with such allegations within the School will do so with sensitivity and will act in a careful, measured way.

#### Receiving an Allegation Regarding a Member of Staff

A member of staff who receives an allegation about another member of staff should follow the guidelines below for dealing with disclosure.

The allegation should be reported immediately to the Principal, unless the Principal is the person against whom the allegation is made, in which case the report should be made to the Proprietor

The Principal (or the Proprietor if applicable) should:

- Obtain written details of the allegation from the person who received it, that are signed and dated. The written details should be countersigned and dated by the Principal (or the Proprietor).
- Record information about times, dates, locations and names of potential witnesses.
- where the allegation is considered to be either a potential criminal act or indicates that the child, young person or vulnerable adult has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to Karen Pottinger and the Local Safeguarding Children Board. In this case the member of staff is likely to be suspended with pay, until the necessary investigation has been concluded. (Please see the School Disciplinary policy).
- It is important that the allegation is not investigated at this point. The Principal/Designated Safeguarding Lead or another Senior Manager should, in the first instance, contact CAAS in order to liaise with the Local Authority Designated Safeguarding Lead (DO (schools) or DO). Through discussion and consultation, a decision will be made whether to hold an Allegation Strategy Meeting. Where the allegation is against the Principal, the Proprietor will take this action. The safety, welfare and protection of the young person(s) will be taken into account and risk assessed and may result in the member of staff being suspended on full pay while the matter is investigated.

#### Potential Outcomes

- There is no case to answer (the school's disciplinary policy may be followed when managing the accuser) The allegation can be shown to be false because the facts alleged could not possibly be true.
- The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm. The matter should be addressed in accordance with the School disciplinary procedures.

#### Enquiries and Investigations

- The School may be able to use the outcome of external agency enquiries as part of its own procedures. Although external agencies have no power to direct the School to act in a particular way the School will assist the agencies with their enquiries.
- The School shall suspend its own disciplinary procedures while the formal Police or the Social Care Service investigations proceed; to do otherwise may prejudice the investigation. Please refer to the School Staff Disciplinary Procedures.

Subject to objections from the police or other investigating agency, the Designated Person shall:

- Inform the person or parent/carer/guardian making the allegation that the investigation is taking place

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and what the likely process will involve.

- If applicable, ensure that the parents/carers/guardians of the person making the allegation have been informed that the allegation has been made and what the likely process will involve.
- Inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve.
- Inform the Proprietor of the allegation and the investigation.
- The designated person shall keep a written record of the action taken in connection with the allegation.

### The Disciplinary Investigation

- The disciplinary investigation should be conducted in accordance with the existing staff, the School disciplinary procedures and guidance from the LADO.
- The person making the allegation and/or their parents/carers/guardians should be informed of the outcome of the investigation and proceedings. This should occur prior to the return to School of the member of staff (if suspended).

### Allegations without Foundation

- False allegations may be indicative of problems of abuse elsewhere. A record should be kept and consideration given to a referral to the Local Safeguarding Children Board in order that other agencies may act upon the information.
- In consultation with the Proprietor, the Principal shall:
- Inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary action will be taken. Consideration should be given to offering counselling/support from the point of suspension.
- Inform the parents/carers/guardians of the alleged victim that the allegation has been made and of the outcome.
- Where the allegation was made by a child, young person or vulnerable adult other than the alleged victim, consideration to be given to informing the parents/carers/guardians of that person.
- Prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.

### Records

- It is important that documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file. If a member of staff is dismissed or resigns before the disciplinary process is completed, he/she should be informed about the School's statutory duty to report promptly to the Disclosure and Barring Service (DBS), any person (whether employed, contracted, a volunteer or student) who has harmed, or poses a risk of harm to a child and who has been removed from working (paid or unpaid) with children, or would have been removed had he or she not left earlier). That consideration will be given to making a referral to the National College for Teaching and Leadership (NCTL) where a teacher has been dismissed for misconduct (or would have been dismissed had he/she not resigned first).

*Note: The reasons for such an order are: 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'. Statutory guidance is available to support "consideration", which must be genuine.*

### Monitoring Effectiveness

- Where an allegation has been made against a member of staff, the Principal and Proprietor should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of the School's procedures and/or policies and/or which should be drawn to the attention of the Local Safeguarding Children Board. Consideration should also be given to the training needs of staff.

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### F. Terminology A - Z

**Abuse** is defined in the new guidance as: “a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children”.

#### **Abuse Definitions**

The School recognises the following as definitions of abuse:

Abuse may fall into a number of categories eg physical, emotional, neglect and sexual. Examples of abuse are outlined below. These examples are by no means exhaustive.

#### **Types of abuse and neglect.**

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

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

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

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

**Neglect:** the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate

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food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

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**Child** refers to all young people who have not yet reached their 18th birthday.

**Child protection** refers to the processes undertaken to meet statutory obligations laid out in the Children Act 1989 and associated guidance (see Working Together to Safeguard Children, A guide to inter-agency working to safeguard and promote the welfare of children, 2015) in respect of those children who have been identified as suffering, or being at risk of suffering harm.

**Child Sexual Exploitation (CSE)** : Sexual exploitation of children is child sexual abuse and often also involves physical and emotional abuse. A child involved in commercial sexual exploitation of any kind should be treated as the victim of abuse. Sexual abuse involves the exploitation of both girls and boys under the age of 18. Children do not make 'informed' choices to enter or remain in sexual exploitation but may do so from coercion, enforcement, manipulation or desperation.

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

Potential vulnerabilities include:

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

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- Having a prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;
- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

More information can be found in:

Child sexual exploitation: Definition and a guide for practitioners (DfE 2017)

### **Allegations of abuse made against other children (peer on peer abuse including sexting):**

Staff should recognise that children are capable of abusing their peers. Governing bodies and proprietors should ensure their child protection policy includes procedures to minimise the risk of peer on peer abuse and sets out how allegations of peer on peer abuse will be investigated and dealt with. The policy should reflect the different forms peer on peer abuse can take, make clear that abuse is abuse and should never be tolerated or passed off as “banter” or “part of growing up”. It should be clear as to how victims of peer on peer abuse will be supported.

Peer on peer abuse can manifest itself in many ways. Governors and proprietors ensure sexting and the school or college’s approach to it is reflected in the child protection policy. The department provides searching screening and confiscation advice for schools. Child Exploitation Online Protection Centre (CEOP) has recently updated their sexting guidance

At Newbury Hall we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other students. We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school’s behaviour policy.

Staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), gender based violence/sexual assaults and sexting.

Different gender issues can be prevalent when dealing with peer on peer abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation-type violence.

Occasionally, allegations may be made against students by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found.

The allegation:

- is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil

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- is of a serious nature, possibly including a criminal offence
- raises risk factors for other pupils in the school
- indicates that other pupils may have been affected by this student
- indicates that young people outside the school may be affected by this student

**Sexting:** In cases of ‘sexting’ we follow guidance given to schools and colleges by the UK Council for Child Internet Safety (UKCCIS) published in August 2016: ‘Sexting in schools and colleges, responding to incidents, and safeguarding young people’.

### Prevention

As a school we will minimise the risk of allegations against other pupils by providing a developmentally appropriate PSHE syllabus which develops students understanding of acceptable behaviour and keeping themselves safe. Newbury Hall also has systems in place for any student to raise concerns with staff, knowing that they will be listened to, believed and valued

### Allegations against other pupils which are safeguarding issues

Occasionally, allegations may be made against students by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. In these cases, Newbury Hall will follow its safeguarding procedures and liaise closely with the West Berks LSCB in order to achieve the best possible outcome for all students concerned.

Where there is a safeguarding concern, the Proprietor or Principal will ensure the child’s wishes and feelings are taken into account when determining what action to take and what services to provide. Systems in the form of feedback interviews, dedicated tutors or specialist counsellors will be in place for children to express their views and give feedback. Ultimately Newbury Hall systems and processes will operate with the best interests of the child at their heart.

Information is transferred safely and securely when a pupil with a Safeguarding Record transfers to another school.

Newbury Hall is a Boarding School and currently has no Looked After children. However the school is aware of the issue and the Proprietor will move to ensure that staff have the skills, knowledge and understanding to keep looked after children safe. The Proprietor and/or Principal would ensure that the DSLs had all relevant details of the child’s social worker and all other relevant details.

**Extremism (see also Radicalisation page 16)** refers to the Government’s ‘Prevent Strategy’ which defines extremism as: “Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Prevent is part of the UK’s Counter Terrorism Strategy, preventing people from becoming involved in terrorism or supporting terrorism. It has been identified that young people are more likely to be vulnerable to violent extremist or terrorist narratives. Schools and colleges have a duty of care to their pupils and staff which includes safeguarding them from the risk of being drawn into terrorism.

The school values freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society’s values. Both students and teachers have the right to speak freely and voice their opinions. However, free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion. The school seeks to protect students and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right/Neo Nazi/White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights Movements. Staff will be made aware at safeguarding training of the characteristics within students and families that may indicate radicalisation or warning indicators of those who may be vulnerable to radicalisation.

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Staff will treat any radicalisation/extremism concerns in the same manner as safeguarding concerns and will follow the school's child protection and safeguarding procedures.

**Female Genital Mutilation (FGM):** FGM is a collective term for procedures which include the removal of part / all of external female genitalia for cultural or other non-therapeutic reasons. This practice is illegal in this country by the Female Genital Mutilation Act 2003 except on specific physical and mental health grounds. Any suspicion of intended or actual FGM must be referred to Children's Social Care.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

Symptoms of FGM

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM.

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- frequent urinary, menstrual or stomach problems.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- frequent urinary, menstrual or stomach problems.
- reluctance to talk about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure.

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out; and discuss any such cases with the safeguarding lead and children's social care. The duty does not apply in relation to at risk or suspected cases.

**Forced Marriage:** The difference between an arranged and a forced marriage The tradition of arranged marriages has operated very successfully within many communities and many countries for a very long time.. A clear distinction must be made between a forced marriage and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in arranging the marriage but the choice whether to accept the arrangement remains with the individuals. In forced marriage, at least one party does not consent to the marriage and some element of duress is

## CHILD PROTECTION (SAFEGUARDING) POLICY

involved. Forced marriage is primarily an issue of violence against women. Most cases involve young women and girls aged between 13 and 30 years, although there is evidence to suggest that some victims are male. Forced marriage is a criminal offence; the offences can include abduction, physical violence and threatening behaviour. Sexual intercourse without consent is rape. If you suspect that one of your students is being forced into a marriage against their will or if a female ethnic minority student leaves School unexpectedly and without explanation, contact the Designated Safeguarding Lead.

### **Historical Abuse**

Non-recent abuse (also known as historical abuse) is an allegation of neglect, physical, sexual or emotional abuse made by or on behalf of someone who is now 18 years or over, relating to an incident which took place when the alleged victim was under 18 years old.

Many people who were abused in childhood believe that they are to blame and that the abuse was their fault. But this is never the case - a child cannot consent to abuse.

In countless circumstances children are too young to fully understand or articulate what is happening to them. Some spoke out at the time but weren't believed. Others were too embarrassed to tell anyone or did not know who to turn to. For many, the abuse may have been too difficult to process and they may only remember aspects of what happened as they get older. Others may have lived with the memories all their lives. Whether the abuse happened once or hundreds of times, a year or 70 years ago, whatever the circumstances, there are people who can help. It is never too late. There is no excuse for abuse. It is never too late to report the abuse.

Please speak to the Designated Safeguarding Lead and your situation will be treated sensitively. Alternatively, you may wish to contact the police or NSPCC and details for this are shown below.

If someone comes to you with a disclosure of historical abuse, please take the time to listen to them, take notes, sign and date it. Then explain that you will pass the matter to the Designated Safeguarding Lead who in turn may wish to speak to them and will contact the local police if necessary.

Adults often report non-recent abuse to stop the offender abusing other children. Some feel that reporting gives them a greater sense of closure.

Deciding on when or whether to report can be very difficult. You should never feel forced to take any action that you do not feel comfortable with.

It may be reassuring to know that if you do decide to report, you will be supported throughout the process.

The more information you are able to provide, the better such as your name and contact details, the name of the alleged perpetrator and the location and (approximate) dates that the abuse took place.

- **Reporting to the police**

You can report abuse to the police regardless of how long ago it happened.

For example; if you were a victim of childhood sexual abuse and decide to report this to the police:

- firstly contact the local police on the UK wide non-emergency number 101 and briefly explain what you are calling about
- you will be put through to a specifically trained officer such as a sexual offences liaison officer (SOLO) who will take an initial statement
- the SOLO will arrange with you a time and place that you feel comfortable with, to take a more detailed statement
- your details will be treated sensitively throughout and you do not have to face the alleged offender.

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What happens next?

- the role of the police is to investigate the crime and recover evidence
- the role of the Crown Prosecution Service is to decide if there is enough evidence to prove the abuse occurred 'beyond reasonable doubt'
- even if there is little evidence it might be taken to court if there is a concern for public safety.

The process will not be a short one, but the police will update you of the developments.

- **Contact the NSPCC**

If you do not feel comfortable contacting the police directly you can contact the NSPCC Helpline any time where an advisor will discuss with you your options for reporting.

If you decide you wish to report and provide the name and details for yourself and the alleged offender the NSPCC will pass this information onto the police on your behalf.

The police will then contact you in order to discuss the disclosure further and arrange to take a formal statement. Your details will be treated sensitively throughout.

**'Honour-based' violence:** So called 'honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing. All forms of so called HBV are an abuse (regardless of the motivation) and should be handled and escalated as such. Where staff are concerned that a child may be at risk of HBV, they must contact the Designated Safeguarding Lead as a matter of urgency.

### **Online safety (e-safety):**

As schools and colleges increasingly work online it is essential that children are safeguarded from potentially harmful and inappropriate online material. As such governing bodies and proprietors should ensure appropriate filters and appropriate monitoring systems are in place. Additional information to support governing bodies and proprietors is provided in Annex C (see page 21).

Newbury Hall expects all pupils to adhere to its guidelines for the safe use of the internet and additionally takes the following preventive measures.

Internet blocking technologies are continually updated and harmful sites are blocked by our filtering system. PSHE lessons and ICT lessons offer guidance on the safe use of social networking sites and cyber-bullying which covers blocking and removing contacts from "buddy lists". Additionally, guidance is offered on keeping names, addresses, passwords, mobile phone numbers and other personal details safe. Students are made aware of the risks of new communications technologies, the consequences of their misuse, and how to use them safely including personal rights. Mobile phones are not permitted in the classrooms unless with the teacher's permission. The use of cameras on mobile phones is not allowed in school bathroom areas or in the bedrooms of the residence or changing areas when on school visits. Staff can recognise non-verbal signs and indications of cyber-bullying. These include depression, anxiety, or fear. Staff should be alert to students seeming upset after using the internet or their mobile phone. This might involve subtle comments or changes in relationships with friends. They might be unwilling to talk or be secretive about their online activities and mobile phone use. Publicise and promote the message that asking for help is the right thing to do and shows strength and good judgement. Publicise to all members of the school community the ways in which cyber-bullying can be reported. The Principal may impose sanctions for the misuse, or attempted misuse of the internet.

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

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**Private Fostering:** A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the school, we will take steps if necessary to verify the relationship of the adults to the child who is being registered.

**Radicalisation (see also Extremism page 12)** is the process where someone has their vulnerabilities or susceptibilities exploited towards crime or terrorism – most often by a third party, who have their own agenda, who have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people being drawn into terrorism'. This has become known as the 'Prevent Duty'.

Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalized, they should discuss this with the Designated Safeguarding Lead.

The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.

We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

### Recognising Extremism

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school

## CHILD PROTECTION (SAFEGUARDING) POLICY

- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, artwork or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

**Safeguarding and promoting the welfare of children** is defined 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. (Keeping Children Safe in Education, September 2016).

**SEND:** Children and young people with special educational needs and disabilities can face additional safeguarding challenges because:

there may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration; children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs; and difficulties may arise in overcoming communication barriers. At Newbury Hall we identify students who might need more support to be kept safe or to keep themselves safe by:

Newbury Hall will endeavour to support vulnerable pupils through: Its ethos which promotes a positive, supportive and secure environment; giving pupils a sense of being valued; its behaviour policy aimed at supporting vulnerable pupils in school; all staff will agree a consistent approach which focuses on the behaviour of the offence committed by the child; working to support children in developing positive behaviour; liaison with other appropriate agencies which support the pupil; developing supportive relationships; monitoring pupil welfare, keeping accurate records and notifying appropriate agencies when necessary; allowing designated staff opportunity to attend face to face Safeguarding in Schools briefings/ LSCB multi-agency training (for example Prevent, Child Sexual Exploitation guidance, domestic violence, drugs / alcohol substance misuse etc.)

**Staff** refers to all those working for or on behalf of the school, full time or part time, in either a paid or voluntary capacity.

### **Student going missing from the school premises/Children missing education (CME):**

If the student is missing from a lesson, teachers will contact the office to check the student's whereabouts. If there is no legitimate reason for an absence, the office will contact the Residence who will check if the student is in his/her bedroom. If a student is missing from registration in the evening the Houseparent on duty should check if the student has signed out for the afternoon and has signed back in. The Houseparent should also check if the student has an evening commitment. Repeated absence will be followed up, investigated, recorded and analysed and any safeguarding concerns dealt with in line with Newbury Hall safeguarding procedures, which may include liaising with the West Berks LSCB.

## CHILD PROTECTION (SAFEGUARDING) POLICY

Knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school can be an indicator of abuse and neglect and may also raise concerns about child sexual exploitation. We monitor attendance carefully and address poor or irregular attendance without delay.

In response to the guidance in Keeping Children Safe in Education (2016) the school has:

1. Staff who understand what to do when children do not attend regularly
2. Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
4. Procedures to inform the local authority when we plan to take pupils off-roll when they:
  - a. leave school to be home educated
  - b. move away from the school's location
  - c. remain medically unfit beyond compulsory school age
  - d. are in custody for four months or more (and will not return to school afterwards); or
  - e. are permanently excluded

We will ensure that pupils who are expected to attend the school, but fail to take up the place will be referred to the local authority and/or visa authorities as appropriate.

When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

## CHILD PROTECTION (SAFEGUARDING) POLICY

Assessor:	Ellen Launchbury and Charlene Lepeck		
Date:	15.05.2017	Review Date:	15.05.2018

What are the hazards?	Who could be harmed?	Control measures in place	Further actions required	Action by whom?	Action by when?
Personal Safety – unidentified person on site poses potential intruder threat	Students & Staff	All visitors/contractors should report to the school office on arrival. All visitors/ contractors must sign in the visitors book and wear a visitor badge for the duration of their visit Staff will be informed of contractors due to commence work. All staff must be identifiable by Newbury Hall staff badge. All Maintenance and Cleaning staff must be identifiable by NWH clothing. 'Challenge Policy' in operation – staff and students are briefed to challenge any unidentified stranger so long as it does not put themselves at risk.	Monitor visitor signing in/out procedures.  Monitor the wearing of staff ID.  Safeguarding briefing delivered for students at the start of the term and staff at induction.	All staff and Students	Ongoing
School Security Issue – access to building and contents through unmanned entrances	Students & Staff	Exterior doors should be kept closed (and alarmed where possible). School office door should be locked if no person is in the office. Car park gates are closed at 18.30 at the end of the day.	Security measures to be passed to staff at induction.  Regularly monitor for compliance and appropriate action taken. Additional training / briefings to be undertaken if regular non-compliance is noted.	All Staff	Ongoing
School Security Issue – open access to the school grounds during the day	Students & Staff	CCTV in operation 24hrs in school grounds trained on 5 key areas - Car Park gate entrance - Visitor gate entrance - Garden - Courtyard - Car park (back)	CCTV maintenance via Fortress Alarms	All staff	Ongoing routine inspections
Safeguarding Issue – non DBS checked persons pose a Child Protection threat	Students	All non DBS visitors must be supervised at all times. Visitor/Contractor access to the Residence will only be authorised by Management Staff. Access will be supervised or access given during hours when the building is unoccupied by students.	Routine Safeguarding briefing for all staff	All Staff	Ongoing
School Security Issue – access to building and contents through windows	Students & Staff	All windows in the school building must be closed as part of the nightly locking routine.  All windows in the Residence must be fitted with restrictors to ensure no access can be gained from the outside. Students to ensure windows are closed upon leaving room (especially those on the ground floor).	Monitor routines. All staff, especially teaching staff in designated classrooms, are accountable for closing and securing windows when they leave. Res and office staff to check and monitor as part of closing the entire building at the end of the school day.	All Staff	Ongoing
Residence Security Issue – intruder could gain access to the Residence using a lost key card	Students & Staff	Any lost Residence Key Card must be reported immediately so it can be cancelled and reissued. Students and staff must accept responsibility of their personal security card and not loan it another	Highlight importance of key card security to all students and staff.	All Staff and Students	Ongoing

## CHILD PROTECTION (SAFEGUARDING) POLICY

		person.			
Mental health problems and self-harm	Students	<p>Mental health difficulties in young people may include –</p> <p>Anxiety, depression, eating disorders, self-harm, bipolar disorder, obsessive compulsive disorder (OCD), schizophrenia, post-traumatic stress</p> <p>Staff are trained to look for signs of -</p> <ul style="list-style-type: none"> <li>● Noticeable weight loss or gain</li> <li>● Restlessness and irritability</li> <li>● Hyper sensitivity to surroundings or actions of others</li> <li>● Being easily distracted or unable to concentrate</li> <li>● Being tearful or 'on edge'</li> <li>● Being less sociable with friends</li> <li>● Unusual behaviour and actions</li> <li>● Showing little interest in things that usually bring enjoyment</li> <li>● Lack of personal care in appearance or hygiene</li> </ul> <p>Staff know the individuals very well and will be aware of significant changes in behaviour or character and escalate to the Safeguarding Officer.</p> <p>First aid reports with unexplained or regular injury will be escalated to the Safeguarding Officer.</p>	Any issues are to be reported to the Safeguarding team and where necessary, referral to GP	All staff and first aiders	Ongoing
Online exploitation	Students	<p>Police talks are regularly scheduled to discuss latest issues with students. Students are asked to sign an appropriate use form at induction. Filters are incorporated into Newbury Hall internet, restricting use of specific sites.</p>		Designated Safeguarding Officer	At induction and regular refresher sessions
Other issues	Students	<p>The school maintains contact with the LSCB and information provided by KCSIE, NSPCC, Social Media Safety Groups, Children in Need and any other groups that become apparent and would assist us in discharging our duty to safeguard our students.</p> <p>The School is committed to staying up to date with any developments within the scope of safeguarding.</p>		Safeguarding Team	Ongoing

## CHILD PROTECTION (SAFEGUARDING) POLICY

### Associated Policies

- [Anti-bullying](#)
- [Anti-cyber bullying](#)
- [Behaviour Management](#)
- [Child Gone Missing](#)
- [E-safety \(online safety\)](#)
- [Health and Safety](#)
- [Prevent](#)
- [Safer Recruitment](#)
- [SEND](#)
- [Whistleblowing for staff](#)
- [Whistleblowing for students](#)

### Associated Documents

- [Annex A Guidelines on Setting and Maintaining Professional Boundaries](#)
- [Annex B Reporting a Disclosure of Alleged Abuse or a Safeguarding Concern](#)
- [Annex C Definitions of Abuse](#)
- [KCSIE 2016](#)

Signed:



Date: 01.09.17

Jon Crocker  
Principal

Signed:

Date: 01.09.17

Till Gins  
Proprietor