



ROYAL HIGH SCHOOL  
BATH

G D S T  
GIRLS' DAY SCHOOL TRUST

**SAFEGUARDING & CHILD PROTECTION [ELIZABETH CUNNINGHAM] 2019-20**

**This policy applies to the whole school: Prep (including EYFS) and Senior (11-18)**

**It should be read in conjunction with: *Keeping Children Safe in Education* and the *GDST Safeguarding Procedures***

The Designated Safeguarding Leads at the Senior School are:  
Elizabeth Cunningham (DSL, Deputy Head, Pastoral),  
Deborah Cowell (Deputy DSL, Student Welfare Coordinator),  
Emma Custodio (Deputy DSL, Head of Boarding),

In the Prep School:  
Daniel Rushworth (DSL, Prep School Deputy Head)  
Michelle Fernandez (DSL for EYFS, EYFS Lead Teacher).

Contact details for all DSLs can be found in 11.1.

## **1. Policy Statement**

### **1.1 Safeguarding and Child Protection Policy**

1.1.1 The Royal High School (“the School”) is committed to safeguarding and promoting the welfare of children. All students have the right to be protected from all types of harm and abuse. This *Safeguarding and Child Protection Policy* (“this Policy”) forms a fundamental part of our approach to providing excellent pastoral care to *all* students, including young people who may be over the age of 18 years.

1.1.2 This Policy and its implementation procedures set out the arrangements to safeguard and promote the welfare of students at the School. They have been prepared in compliance with, and with regard to:

- The Education Acts
- *Education (Independent Schools Standards) Regulations 2014* (as amended from time to time)
- *Independent School Standards Guidance for independent schools* April 2019
- Safeguarding Vulnerable Groups Act 2006
- The Protection of Freedoms Act 2012
- The Children Act 2004
- *What to do if you're worried a Child is being Abused* March 2015
- *Working Together to Safeguard Children* July 2018 (A guide to inter-agency working to safeguard and promote the welfare of children)
- *Keeping Children Safe in Education* September 2019
- *Disqualification under the Childcare Act 2006* September 2018
- *Information Sharing: advice for practitioners providing safeguarding services* July 2018

- DBS Referrals Guidance (as may be amended from time to time)
- *ISI Commentary on the Regulatory Requirements* September 2018
- *National Minimum Standards for Boarding Schools* April 2015
- *Teacher misconduct: regulating the teaching profession* March 2014 (and related guidance)
- *Use of Reasonable Force in Schools* July 2013
- *Preventing and Tackling Bullying* October 2014
- *Statutory Framework for the Early Years Foundation Stage (EYFS)* April 2017
- *Prevent Duty Guidance, Channel Guidance, and Prevent Departmental Advice*, 2015
- *The use of social media for online radicalisation* July 2015
- *Teaching Online Safety in School* June 2019
- *Sexting in schools and colleges: responding to incidents and safeguarding young people* UKCCIS
- *Sexual violence and sexual harassment between children in schools and colleges* May 2018
- *Relationships Education, Relationships and Sex Education (RSE) + Health Education*

1.1.3 The School recognises and acts upon the legal duties set out in the above statutes, regulations and guidance, to protect its students (and staff) from harm, and to co-operate with other agencies in carrying out those duties and responding to safeguarding concerns.

1.1.4 This policy is used in accordance with locally agreed inter-agency procedures, and specifically in accordance with Bath and North East Somerset (B&NES) Children and Families Duty and Assessment Team. The School will ensure that its safeguarding arrangements take into account local procedures and practice, including local criteria for action and protocol for assessment.

1.1.5 This policy is addressed to all members of staff and volunteers at the School (temporary and permanent). Adherence to this policy is mandatory for **all** staff and volunteers and its use is not subject to discretion. This policy applies whenever staff or volunteers are working with students, including where this is away from the School, for example at another institution, on school visits and trips, as well as sporting and cultural activities.

1.1.6 This policy is available to all parents, staff and volunteers on the School's website. A paper copy of this policy is also available to parents upon request to the School office.

1.1.7 Students are taught about safeguarding both on and offline, including how to adjust their behaviour to reduce risks, keep themselves safe and build resilience; and are made aware of this policy through the PSHEE programme and other means of sharing information appropriate to their age and understanding, within a broad and balanced curriculum.

## 1.2 Creating a Culture of Safeguarding

1.2.1 The School recognises that safeguarding covers much more than child protection, and so this Policy will operate in conjunction with the *GDST Safeguarding Procedures* (which itself incorporates the staff Code of Conduct), and other related policies and procedures. These cover areas including equal opportunities; Health and Safety; First Aid; Educational Visits; Anti-bullying; Behaviour Management; Drugs, Alcohol and Tobacco; Information Sharing; Online Safety (including mobile technology and social media); Fundamental British Values, and Preventing radicalisation and violent extremism. Such policies are available from the School on request.

The School takes seriously its responsibility to promote and nurture the mental health and wellbeing of all its students and staff. This is reflected in its policies and procedures for pastoral care and the School's PSHEE programme.

1.2.2 ‘Safeguarding’ is broader than ‘child protection’. As well as protecting children from harm, ‘safeguarding’ widens the responsibility to preventing harm and promoting the welfare of children. It is recognised that safeguarding and promoting the welfare of children includes:

- Protecting children from maltreatment
- Preventing the impairment of children’s health or development
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes.

Where a child is suffering significant harm, or is likely to do so, action will be taken to protect that child. Action will also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or at immediate risk. The School recognises the importance of children receiving the right help at the right time to address risks and prevent issues escalating, the importance of acting on and referring the early signs of abuse and neglect, keeping clear records, listening to the views of the child, reassessing concerns when situations do not improve, sharing information quickly, and challenging inaction.

1.2.3 Safeguarding and promoting the welfare of children is everyone’s responsibility. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. Everyone who works with our students should make sure that their approach is child-centred (that is, that they consider at all times what is in the best interests of the child).

1.2.4 As well as ensuring that the School’s policies and procedures support its safeguarding responsibilities, the School will work with students and their families, and contribute to inter-agency working, in line with the statutory guidance *Working Together to Safeguard Children*. This includes providing a co-ordinated offer of early help when additional needs of children are identified, and contributing to inter-agency plans to provide additional support to children subject to child protection plans.

We are committed to working in partnership with parents, Social Services Departments and diverse communities, to continuously develop and improve the safeguarding culture within our School.

1.2.5 Having these safeguards in place not only protects and promotes the welfare of children but also it enhances the confidence of our staff, volunteers, parents/carers and the general public.

1.2.6 The School has systems to:

- Prevent unsuitable people working with students;
- Identify students who are at risk of and/or are likely to suffer significant harm and take appropriate action, and promote the welfare of students in need of additional support;
- Promote safe practice and challenge poor and unsafe practice;
- Protect students and staff from online risks, which include online safety education and training, policies and procedures governing the use of IT, filtering and monitoring systems, and procedures to manage any incidents that occur;
- Filter and monitor online activity via applications which prevent access to blocked internet sites, and report on attempts to access sites that may give rise to concern. Email messages between staff and students are also scanned for inappropriate language and behaviour;
- Deal with issues of confidentiality, information sharing and consent;

- Ensure that staff do not, through their actions, place **students** at risk of harm, or place themselves at risk from an allegation of harm (by providing guidance on areas such as 1:1 tuition, sports coaching, conveying by car, inappropriate electronic communication). Relevant guidance can be found in the *GDST Safeguarding Procedures* (Part A Section 3: *Code of Conduct*).

1.2.7 The School encourages the students in its care to raise any concerns that they might have and ensure that these are taken seriously. The School also encourages students to contribute their own ideas, appropriate to their age and understanding, about how their safety and welfare could be further improved.

1.2.8 All staff are required to adhere to the *ICT Acceptable Use Agreement*, and specifically to ensure that any images taken of students are appropriate and stored and managed safely.

### 1.3 Implementation Procedures

The School has implementation procedures to assist staff and volunteers when handling safeguarding concerns.

Information on these procedures is available to all staff and volunteers at the School and the procedures must be followed at all times.

### 1.4 Early Years Foundation Setting

1.4.1 This policy applies to the School's provision for the Early Years Foundation Setting ('EYFS'). The identity of and contact details for the Designated Safeguarding Lead/s with responsibility for safeguarding within this setting are set out at the head of this policy and in para 11.1 below.

1.4.2 Throughout the setting all persons in the EYFS are required to adhere to the *ICT Acceptable Use Agreement* on the use of mobile phones and cameras: that is, that images of students may not be stored on personal devices. Any images taken on personal devices will be transferred to school or GDST systems as soon as reasonably possible and the personal copy permanently removed.

1.4.3 Safeguarding training for staff in the EYFS will include guidance on identifying signs of possible abuse and neglect (such as significant changes in a student's behaviour, deterioration in wellbeing, physical indications, comments which give cause for concern, or any reasons to suspect neglect or abuse outside the setting), and on how to respond in a timely and appropriate way to such signs or to inappropriate behaviour in other members of staff or any other person working with children (EYFS Statutory Framework 3.6).

### 1.5 Children with Special Educational Needs and Disabilities

Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges, including particular vulnerability to peer-on-peer abuse. Staff must be alert to the fact that additional barriers can exist when recognising abuse and neglect in this group of children. These may include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further explanation;
- Being more prone to peer group isolation than other children;
- The potential for children with SEND to be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers.

To address these additional challenges, children with SEND may require extra pastoral support. The additional vulnerabilities of pupils with SEND and the school's duty to make reasonable adjustments should be particularly carefully considered in situations where the use of reasonable

force may be needed in response to risks presented by incidents involving children with SEND or medical conditions.

## 1.6 Looked After Children and Previously Looked After Children

The School will ensure that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after, or have been looked after, by the local authority.

## 1.7 Private Fostering

Private fostering occurs where a child under the age of 16 (or 18 if disabled) is provided with care and accommodation by someone to whom they are not related in that person's home. If a member of staff becomes aware that a student may be in a private fostering arrangement, they should raise this in the first instance with the Designated Safeguarding Lead. The School will then notify the local authority of the circumstances.

## 1.8 Boarding

1.8.1 As a school with boarding students the Royal High School Bath recognises the special measures that need to be in place to promote the welfare of children living away from home. Staff are aware of the particular need to be alert to student relationships and the potential for peer abuse.

1.8.2 All adults visiting boarding accommodation (e.g. visitors and maintenance personnel) are kept under sufficient staff supervision to prevent substantial unsupervised access to boarders or their accommodation.

1.8.3 There is a written agreement between the School and any person over 16 not employed by the School but living in the same premises as boarders (for example, members of staff households). This specifies the terms of their accommodation, guidance on contact with boarders, their responsibilities to supervise their visitors, and notice that accommodation may cease to be provided if there is evidence that they are unsuitable to have contact with children. They are also required to notify an unrelated designated senior member of staff if they are charged with, or convicted of, any offence.

1.8.4 Resident members of staff households are also made aware of the *Safeguarding Procedures* by the School, and sign a declaration that they have read and will act in accordance with the *Safeguarding Policy*.

1.8.5 If an allegation is made against a member of the boarding staff, the Head may require the member of staff to be relocated to a residence off site, pending a full investigation.

1.8.6 There is a policy, known to staff and used in practice, for searching for and, if necessary reporting, any boarder missing from school. This can be found in the boarding house handbooks.

1.8.7 The School makes known to boarding students, through information posters and briefings, their right to complain about the boarding provision to the Children's Commissioner:  
[www.childrenscommissioner.gov.uk](http://www.childrenscommissioner.gov.uk)  
tel: 0800 528 0731

## 2. **Aims**

### 2.1 Our aims are to:

2.1.1 Create an environment in the School which is safe and secure for all students.

2.1.2 Encourage our students to establish satisfying relationships within their families, with peers and with other adults.

2.1.3 Encourage children to develop a sense of autonomy and independence.

2.1.4 Work with parents to build their understanding of and commitment to the welfare of all students.

2.2 In order to fulfil these aims the Head will take the necessary steps to ensure that:

2.2.1 All staff (including supply and temporary staff) and volunteers receive training in safeguarding children and an explanation of the systems within the School which support this as part of their induction. This includes:

- the School's Safeguarding and Child Protection policy and *GDST Safeguarding Procedures* (which incorporates the staff *Code of Conduct*)
- Part 1 and Annex A of *Keeping Children Safe in Education*
- The Whistleblowing policy
- The School's behaviour policy
- The safeguarding response to children who go missing from education
- The identity and role of the Designated Safeguarding Lead(s) and Deputy Designated Safeguarding Lead(s)
- Online safety

2.2.2 All staff, volunteers and the Head are trained in child protection (including Prevent awareness, online safety training, the local early help process and how to manage a report of child on child sexual violence or sexual harassment) regularly (in line with B&NES Children and Families Duty and Assessment Team requirements), and receive safeguarding and child protection updates as required, but at least annually. The Designated Safeguarding Lead(s) receive(s) the required updated child protection and Prevent training at least every two years (as set out in Annex B of *Keeping Children Safe in Education*)

2.2.3 The School adheres to the GDST's Recruitment Policy and guidance (available on the GDST staff intranet and from the School on request) and safer recruitment procedures (found in the *Safeguarding Procedures* Part B Section 6). Procedures are in accordance with the *Independent School Standards Regulations* and include ensuring that at least one member of any recruitment panel involved in all stages of the recruitment process has undertaken the appropriate training in Safer Recruitment, and carrying out all required checks on the suitability of all staff and volunteers to work with children and young people in accordance with the guidance and regulations set out at paragraph 1.1.2. Appropriate supervision arrangements are put in place if staff start work before their DBS disclosure has been obtained, and in all cases a Barred List Check and Prohibition Order check (if applicable) will have been undertaken. Relevant staff are also asked to confirm that they do not meet the criteria for disqualification under the Childcare Act 2006 and the 2018 Regulations.

2.2.4 The School obtains assurance that appropriate child protection checks are carried out and procedures apply to any staff or volunteer of another organisation who work with the School's students on another site (for example, in a separate institution).

2.2.5 The School carries out the mandated checks on the suitability of all people who serve on our School Governing Board in accordance with the guidance and regulations set out at paragraphs 1.1.2 and in accordance with GDST policy. The required checks on Trustees (as the proprietors) are carried out centrally by the GDST.

2.2.6 Where the School ceases to use the services of any person (whether employed, contracted, a volunteer or student) or the person resigns or otherwise ceases to provide his or her services because it is considered that the person may be unsuitable to work with children, a referral will be made to the Disclosure and Barring Service (DBS) in accordance with the procedural guidance at

<https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs> (contact: PO Box 181, Darlington, DL1 9FA. Tel: 01325 953795, email [dbsdispatch@dbs.gsi.gov.uk](mailto:dbsdispatch@dbs.gsi.gov.uk)). In cases involving teaching staff, the School will also decide whether to refer the matter to the Teaching Regulation Agency (TRA) to consider prohibiting the individual from teaching.

2.2.7 All School staff are alert to signs of abuse and neglect, and all staff know to whom they should report concerns or suspicions of abuse or neglect.

2.2.8 All School staff keep themselves updated on safeguarding issues and child protection procedures by accessing advice, guidance and training as appropriate to their role.

2.3 This policy is compatible with and meets all applicable requirements of Bath and North East Somerset LSCB/local safeguarding partners. The School ensures that it has positive communication with the LSCB/local safeguarding partners to ensure compliance with local protocol and access to relevant support. The LSCB/local safeguarding partners can be contacted through the Local Social Services Department (Children's Services) "Social Services". Their contact details are set out in paragraph 11.3 below.

### 3. Responding to Safeguarding and Child Protection Concerns

3.1 Everyone who comes into contact with children and their families has a role to play in safeguarding children. School staff are particularly important as they are in a position to identify concerns early and provide help for children, to prevent concerns from escalating. School staff have a responsibility to identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm. All staff then have a responsibility to take appropriate action, working with other services as needed.

3.2 Any concern, allegation or incident of abuse must be referred to the Designated Safeguarding Lead immediately. Staff should not assume that a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. If in doubt about sharing information or recording requirements, staff should discuss this with the Designated Safeguarding Lead. Fears about sharing information **must not** be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.

3.3 If staff have concerns about a child (as opposed to a child being in immediate danger or at risk of harm – see para 3.5 below) they will need to decide what action to take. All staff should be prepared to identify children who may benefit from **early help**, that is, support as soon as a problem emerges. Such problems should be discussed in the first instance with the Designated Safeguarding Lead. The early help process may also involve sharing information with other professionals and contributing to an early help assessment.

3.4 Any child may benefit from early help, but 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
- Is a young carer
- Is showing signs of being drawn into anti-social or criminal behaviour
- Is frequently missing/goes missing from care or from home
- Is misusing drugs or alcohol
- Is at risk of modern slavery, trafficking or exploitation
- Is in a family circumstance presenting challenges for the child
- Has returned home to their family from care

- Is at risk of being radicalised or exploited
- Is a privately fostered child

3.5 If a child is in **immediate danger or at risk of harm**, this must be reported to the Designated Safeguarding Lead, who will make a referral to children's social care and/or the police immediately (see section 5.12). It is not the role of the School to investigate suspected or alleged abuse; this is the role of the Police and Social Services.

### 3.6 What is Child Abuse?

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

The categories listed below are drawn from *Keeping Children Safe in Education*:

- 3.6.1 **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, or deliberately induces, illness in a child.
- 3.6.2 **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 children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as 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.
- 3.6.3 **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 the production of sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.
- 3.6.4 **Neglect** - the persistent failure to meet a child's basic physical and/or psychological needs likely to result in the serious impairment of the child's health or development.

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

3.6.5 Child sexual exploitation (CSE), child criminal exploitation (CCE) and forms of so-called 'honour based' violence including female genital mutilation (FGM) and breast ironing are child abuse, and domestic abuse and attempts to draw children into violent extremism or serious violent crime should also be treated as a safeguarding issues. Further information on these areas can be found in the *Safeguarding Procedures*. If a teacher discovers that an act of FGM appears to have been carried out on a student under the age of 18 the teacher must report this to the police.

3.6.6 Sexting is a child protection issue. Even if explicit material is sent or elicited without malicious intent the consequences are serious and put those involved at risk of serious harm. Having or sending explicit material on digital devices is also a criminal offence for those under 18. Students are taught about sexting as part of their internet safety education. The School takes incidences of sexting extremely seriously, and deals with them in accordance with child protection procedures, including reporting to the police.

3.6.7 **Who are the abusers?** Abusers might be parents or carers, siblings or members of the extended family, neighbours, teachers, strangers; in short, an abuser could be anyone.

3.6.8 **Peer on peer abuse:** all staff should also recognise that children are capable of abusing their peers. This is most likely to include, but is not limited to:

- bullying (including cyber bullying)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment
- upskirting
- sexting (also known as youth produced sexual imagery), and
- initiation/hazing type violence and rituals

It is more likely that girls will be victims of peer abuse and boys perpetrators, but all peer on peer abuse is unacceptable and will be taken seriously. Peer on peer abuse should be recognised as abuse and never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'. The school seeks to minimise the risk of such abuse by ensuring that it is clear to all members of the school community that it not tolerated, and by educating students as part of the PSHEE programme about healthy and respectful relationships, the wider societal factors (such as sexist stereotypes and language), and how to recognise, report and respond to peer abuse.

Any allegation of such abuse will be promptly and thoroughly investigated, recorded and treated according to its gravity. The threshold for dealing with an issue of student behaviour or bullying under the safeguarding procedure is, subject to local specifics as in any other cases, when there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. In such cases the school's response will include referral to children's social care or the police. Victims, perpetrators and any other child affected will be supported within the pastoral care structure, taking account of their views and feelings, and support may include counselling where appropriate. All children involved will be treated as 'at risk'. Further information can be found in the *Safeguarding Procedures*.

3.6.9 **Contextual safeguarding:** safeguarding incidents and/or behaviours can be associated with factors outside the school and can occur between children outside the school. All staff should consider the context within which such incidents and/or behaviours occur. It is important to provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

### 3.7 Signs of abuse

All School staff members should be aware of the signs of abuse, neglect and radicalisation so that they are able to identify cases of children who may be in need of help or protection.

The following may help staff to be aware of possible signs of abuse - There are further sources of information such as the *GDST Safeguarding Procedures, What to do if you're worried a child is being abused* and the NSPCC website. However such lists are not exhaustive - if staff members are unsure they should always seek advice and report concerns even where signs/indicators are not present. Staff should also be alert to behaviours or circumstances that put children in danger, such as drug taking, alcohol abuse, self harm, truanting, cyber bullying and sexting.

(There may be other signs of abuse specific to female genital mutilation, and to radicalisation of young people. These are described in the *Safeguarding Procedures*.)

#### 3.7.1 **Physical Abuse**

- Unexplained injuries/burns
- Untreated injuries
- Bruises/abrasion around the face
- Bi-lateral injuries e.g. two bruised eyes
- Bite marks
- Bruising abrasions to lips, cheeks, outer ear

#### 3.7.2 **Emotional Abuse**

- Excessive overreaction to mistakes
- Continual self-deprecation
- Excessive rocking, thumb sucking, hair twisting
- Extreme compliance/aggression
- Drug, alcohol and substance misuse
- Significant peer relationship difficulties

#### 3.7.3 **Sexual Abuse**

- Sexual awareness inappropriate to child's age, including provocative sexual behaviour
- Self-harm
- Pregnancy
- Sexually transmitted diseases
- Sudden changes in behaviour or school performance
- Fear of undressing for gym
- Depression/withdrawal
- Drug, alcohol, substance abuse

#### 3.7.4 **Neglect**

- Constant hunger, tiredness and/or poor personal hygiene
- Untreated medical problems
- Destructive tendencies

- Social isolation
- Poor self-esteem and/or relationship with peers
- Excessive rocking, hair twisting, thumb sucking

### 3.7.5 Missing Children

A child going missing from an education setting is a potential indicator of abuse and neglect. Staff should treat prolonged or repeated absence, or particular patterns of absence, with no satisfactory explanation, as a potential safeguarding issue and take action accordingly. Procedures are detailed in the *GDST Safeguarding Procedures*.

## 4. Designated Safeguarding Lead (DSL)

- 4.1 The School has appointed Senior School Designated Safeguarding Lead and a deputy to contact in their absence. The Designated Safeguarding Lead is a member of the School's Senior Leadership Team with the necessary status and authority to take lead responsibility for child protection matters (including online safety). This responsibility cannot be delegated. The School will ensure that the Designated Safeguarding Lead is given the time/cover, funding, training, resources and support to fulfil their role.

The four Designated Safeguarding Leads may deputise for each other in the event of one of them being absent.

The Designated Safeguarding Lead(s) will ensure that there is always cover for their role (including for any out of hours/out of term activities) and that arrangements for cover are communicated clearly to staff.

The Designated Safeguarding Lead(s) will:

- 4.1.1 be responsible for ensuring that all cases of suspected or actual child protection concerns are dealt with in accordance with the guidance and regulations set out at paragraphs 1.1.2;
- 4.1.2 refer cases of suspected abuse or allegations to the local Social Services Department and/or the police in accordance with LSCB/local safeguarding partner procedures, and work with other agencies in line with *Working Together to Safeguard Children*;
- 4.1.3 receive *Prevent* awareness training; provide advice and support, and make appropriate referrals through the *Channel* programme;
- 4.1.4 ensure that they are aware of the latest national and local guidance and requirements and will keep the Head, staff and volunteers informed as appropriate;
- 4.1.5 receive appropriate training in child protection matters and interagency working, to include both national and local bodies, at least every two years, and in addition to formal training, update their knowledge and skills at regular intervals and at least annually, in order to keep up with developments relevant to the role;
- 4.1.6 ensure that the Head, staff and volunteers have access to and understand their role as appropriate in the child protection procedures, including but not limited to: part-time staff, supply staff, peripatetic staff, newly appointed staff, newly qualified staff, before/after school care staff, boarding staff, gap year students, volunteers, catering staff, cleaning staff and caretakers;
- 4.1.7 act as a source of advice and support within the School and co-ordinate action regarding referrals in relation to both children and allegations against staff.

## 5. Responding to Disclosures of Abuse

5.1 Children are more likely to be abused by someone they know and trust than by a stranger. Staff members are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always take action in the best interests of the child.

5.2 Staff and volunteers should make themselves available to listen and demonstrate to the student that what they are saying is being taken seriously and without criticism, and should respond in a supportive, calm manner, avoiding asking detailed questions. The role of the staff or volunteer is to listen, record and report; not to investigate. Staff and volunteers should take care to ensure that their behaviour and actions do not place Students or themselves at risk of harm.

5.3 If a student reports abuse from another student or students, staff should follow the procedures in this section. All children involved, whether a potential perpetrator or victim, will be treated as being 'at risk'. The Designated Safeguarding Lead will liaise with local agencies in relation to handling any such cases which arise. Further guidance can be found in the GDST *Safeguarding Procedures* (Part A Section 1). A bullying incident will be regarded as a child protection concern where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. See the Anti-Bullying Policy.

### 5.4 Immediate Response

If a disclosure is made, the member of staff or volunteer **should**:

5.4.1 allow the pace of the conversation to be dictated by the student;

5.4.2 ask open questions which encourage the student to talk such as "can you tell me what happened?"

5.4.3 accept what the student says and do not ask for further detail;

5.4.4 acknowledge how hard it was for them to tell you and show by voice tone and/or facial expression that you are taking their concerns seriously;

5.4.5 note carefully any clearly visible external signs of possible injury or neglect (but note paragraph 5.5.4 below);

5.4.6 reassure the student that they have done the right thing, that it is not their fault, and explain whom you will have to tell (the Designated Safeguarding Lead) and why.

### 5.5 The member of staff or volunteer **should not**:

5.5.1 burden the student with guilt by asking questions such as "why didn't you tell me before?"

5.5.2 interrogate or pressure the student to provide information;

5.5.3 ask any potentially leading questions such as those that start with the words, how, what, when, where and why, as this may impact on any potential case brought to court;

5.5.4 undress the child or examine clothed parts of the child's body in an attempt to determine the nature of any such injuries/neglect;

5.5.5 criticise the alleged perpetrator, this may be someone they love;

5.5.6 promise confidentiality (see paragraph 5.6 and 5.7);

5.5.7 make promises that they cannot keep such as "I'll stay with you all the time" or "it will be alright now";

5.5.8 put words in the child's mouth (i.e. finish their sentences);

- 5.5.9 jump to conclusions or speculate about what happened or might have happened, or make accusations;
- 5.5.10 show an overly emotional reaction, such as expressing disgust, shock or disbelief;
- 5.5.11 attempt to investigate the allegations.
- 5.6 If a student confides in a member of staff or volunteer and requests that the information is kept secret, staff/volunteers ***must not make promises about confidentiality***. Staff must tell the student sensitively that they have a responsibility to tell the named Designated Safeguarding Lead so that the child can be helped to stay safe and feel better.
- 5.7 In every case, the member of staff/volunteer should consider whether the student is able to provide consent for the information to be shared and if so, seek to obtain that consent in accordance with the *GDST Safeguarding Procedures* relating to information sharing and consent. If the student does not consent, the member of staff/volunteer should explain that they need to share the information with the Designated Safeguarding Lead and reassure them that the information will *only be disclosed* to other people who *need to know*. The member of staff/volunteer should refer to the *GDST Safeguarding Procedures* for further information and guidance.
- 5.8 The School recognises that a child who is abused may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth. We recognise that the School may provide the only stability in the lives of children who have been abused or who are at risk of harm. The School has age appropriate systems in place for children to express their views and give feedback so that their wishes or feelings will be taken into account when determining what action to take and what services to provide. However, the child's wishes or feelings cannot override the duty to refer suspected abuse to children's social care or police.
- 5.9 The School will provide continuing support to a student who has disclosed abuse through promoting a caring and safe environment within the School and encouraging self-esteem and self-assertiveness through the curriculum and through relationships. In doing so, the School will act in accordance with guidance from the relevant authorities to ensure that, for example, legal proceedings are not compromised.
- 5.10 All allegations involving staff or volunteers will be discussed immediately with the Local Authority Designated Officer (LADO) before any investigation takes place. In borderline cases, these discussions can be held without naming the individual.

In any case of immediate risk or serious harm to children, the police shall be informed at the outset.

5.11 Recording Information

Staff/volunteers should:

- 5.11.1 make a record of the disclosure or concern, including the date, time, place and context, and what has actually been said (wherever possible using the child's exact words, even if they seem childish, rude or inappropriate), not assumption or interpretation;
- 5.11.2 clearly distinguish between fact, observation, allegation and opinion;
- 5.11.3 record any observed injuries and bruises;
- 5.11.4 note the non-verbal behaviour and the key words in the language used by the student (do not translate into "proper terms");
- 5.11.5 alert the Designated Safeguarding Lead;

5.11.6 appreciate that their records may be used in criminal proceedings or disciplinary investigations.

## 5.12 Reporting Concerns

5.12.1 Any concerns about Students must be discussed with the Designated Safeguarding Lead (or in their absence the Deputy Designated Safeguarding Lead) as soon as possible and at latest by the end of the school day.

5.12.2 Where the disclosure identifies a safeguarding issue, the Designated Safeguarding Lead will report the disclosure to the local Social Services Department within 24 hours. In the most serious cases, and if there is suspicion that a crime has been committed, the Designated Safeguarding Lead will contact the police.

5.12.3 The School's procedures differentiate between safeguarding children who have suffered significant harm and those who are in need of support from one or more agencies. In cases where a child is not suffering or at risk of suffering serious harm, but rather is in need of additional support, an inter-agency assessment will be undertaken to determine the most appropriate action.

5.12.4 Whilst the Designated Safeguarding Lead will usually decide whether to make a referral, **in exceptional circumstances, such as in an emergency or a genuine concern that appropriate action has not been taken, anyone can refer their concerns to children's social care directly** (see section 9 below). If a member of staff makes a referral independently, they must inform the Designated Safeguarding Lead as soon as possible thereafter.

5.12.5 **If, at any point, there is a risk of immediate serious harm to a child a referral should be made immediately. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point.**

## 6 Allegations against staff

6.1 Schools must follow the procedures for handling allegations made against staff and/or volunteers set out in Part 4 of *Keeping Children Safe in Education*. The aim is to deal with any allegation quickly and in a fair and consistent way which provides effective protection for the child and at the same time provides appropriate support for the person who is the subject of the allegation.

6.2 Where a safeguarding-related allegation or cause for concern is made against any member of staff or volunteer (including the Designated Safeguarding Lead), the matter should be reported immediately to the Head (unless the allegation relates to the Head). The Head should **not speak** to the member of staff who is the subject of the allegation at this point. In the absence of the Head the allegation should be reported to the Director of Legal at Trust Office (or in their absence the Chief Executive).

6.3 Where a safeguarding related allegation or cause for concern is made against the Head, the matter should be reported immediately to the Director of Legal at Trust Office (or in their absence the Chief Executive) without informing the Head. The Director of Legal will in turn inform the member of the GDST Council who is the Safeguarding Lead.

6.4 **In all cases immediate contact should be made with the LADO** to discuss the allegation. The Legal Department at Trust must also be notified. A decision as to how to proceed and eventually whether or not to suspend a member of staff or volunteer will be taken by the Head following consultation with the LADO (and, in the most serious cases, the police) and the GDST. In borderline cases discussions with the LADO can be held informally and without naming the school or individual. Discussions should be recorded in writing, and any communication with both

the individual and the parents of the child/children agreed. Suspension is not an automatic response and the decision will be taken according to the circumstances of each particular case, giving due weight to the views of the LADO, and guidance in *Keeping Children Safe in Education* and *Working Together to Safeguard Children*. The decision as to whether or not to suspend the Head is taken by the GDST alone (having consulted the relevant authorities).

- 6.5 In considering the available options, including redeployment of the member of staff or volunteer, the LADO, GDST and the Head will ensure that their primary concerns are the safety and wellbeing of the Students, together with the need for a full and fair investigation which will be led by the LADO or the police.
- 6.6 As noted in para. 2.2.6 above, where we cease to use the services of any person (whether employed, contracted, a volunteer or student) or the person resigns or otherwise ceases to provide his or her services because it is considered that the person may be unsuitable to work with children, a referral will be made to the DBS. In cases involving teaching staff, the School will also decide whether to refer the matter to the Teaching Regulation Agency (TRA) to consider prohibiting the individual from teaching.
- 6.7 Where required to do so, we will provide information requested by the DBS or TRA in respect of a member of staff or volunteer in accordance with our legal duty.
- 6.8 Communications with the School community about safeguarding-related allegations shall only be made following consultation with the LADO and any investigating authorities. There are restrictions on the reporting or publishing of allegations against teachers (which apply up to the point where the accused person is charged with an offence, or the DfE/TRA publish information about an investigation or decision in a disciplinary case). Every effort will be made to maintain confidentiality and guard against unwanted publicity. The Legal Department will advise on the statutory reporting restrictions on publication of details of allegations.
- 6.9 If there has been a substantiated allegation against a member of staff, the School will work with the LADO to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.

## **7. Roles and Responsibilities**

- 7.1 The School abides by the GDST Safeguarding Procedures which detail the roles and responsibilities of all staff, volunteers and governors in relation to safeguarding. In summary every member of staff and every volunteer who assists the School should:
  - 7.1.1 protect students from abuse
  - 7.1.2 follow the GDST and the School's safeguarding policy and procedures, and read sections of *Keeping Children Safe in Education* appropriate to their role, including subsequent updates to this guidance
  - 7.1.3 know how to access and implement the procedures
  - 7.1.4 know the identity of the School's Designated Safeguarding Lead/s and who to speak to in the absence of the Designated Safeguarding Lead/s
  - 7.1.5 report all safeguarding concerns to the Designated Safeguarding Lead (subject to paragraphs 5.12.4, 6.2 and 6.3 of this Policy)
  - 7.1.6 keep a record of any safeguarding concern, conversation or incident (in accordance with paragraphs 3.2 and 5.11 of this Policy)
  - 7.1.7 undertake appropriate training as detailed in 2.2.2 above.

## **8. Referring Concerns to Social Services**

- 8.1 The decision to make a referral is a serious matter and requires careful judgement. Such decisions should usually only be taken by the Head or by the Designated Safeguarding Lead, who will liaise with the Head as appropriate, following consultation with Social Services. In cases of serious harm, or if a crime may have been committed, the police will be informed from the outset. However, anyone can refer their concerns to children's social care directly (see section 9 below).
- 8.2 Advice to determine the nature of any discussions to have with parents should be sought from Social Services in advance of making a referral. Advice can also be obtained from the Legal Department at Trust Office.
- 8.3 Parental consent is not a requirement for referrals to statutory agencies. However, schools should aim to gain consent of individuals or their parents, depending on age and the circumstances, to share information about them with Social Services and other agencies. Schools should be mindful of situations where to do so would place a child at increased risk of harm. Schools may share information without consent, if it is not possible to gain consent, it cannot be reasonably expected that a school will gain consent, or if to gain consent would place a child at risk.
- 8.4 In the case of concerns about a student being at risk of radicalisation, school staff should follow safeguarding guidelines by reporting to the Designated Safeguarding Lead. This may lead to a referral through the *Channel* programme.
- 8.5 In accordance with paragraph 5.12.2 of this Policy, where the disclosure relates to actual abuse or the suspicion of abuse, the Designated Safeguarding Lead will report the disclosure to Social Services within 24 hours.
- 8.6 In the event of the School making a referral to Social Services, they should agree with the recipient of the referral what exactly the child and parents will be told, by whom and when. The Designated Safeguarding Lead should ask to be kept informed of the timing of the strategy discussion between Social Services and the police, which will decide whether and how to investigate. The Designated Safeguarding Lead should be prepared to contribute to the strategy discussion.
- 8.7 The local authority should make a decision, within one working day of a referral being made, about the type of response that is required and should let the referrer know the outcome. The referrer should follow up if this information is not forthcoming. A record of each contact with Social Services, including the name of the officer with whom the School has spoken, and the date and time of the call, should be kept. If after a referral the child's situation does not appear to be improving, the referrer should consider following local escalation procedures.

## **9. Duty to report concerns about the management of safeguarding**

- 9.1 The School recognises that children cannot be expected to raise concerns in an environment where staff fail to do so. Staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the School's safeguarding regime, and feel confident that such concerns will be taken seriously by the senior leadership team. The duty to report concerns about the management of safeguarding is part of the Code of Conduct, and will also be reflected in staff training.
- 9.2 Where staff or volunteers reasonably believe that safeguarding concerns exist, or where they have concerns regarding the management of safeguarding issues, it is their duty to raise concerns.
- 9.3 The member of staff or volunteer should bring their concerns to the attention of the Designated Safeguarding Lead, or in a case where the concerns relate to the actions or inaction of the Designated Safeguarding Lead, to the Head.

9.4 However, where someone reasonably believes these reporting routes to be inappropriate, or has reported concerns and no action has been taken, they should contact the Director of Legal at Trust Office, refer their concerns to children's social care directly, or use the NSPCC whistleblowing helpline (see section 11 below for contact details).

## 10. Monitoring and Review

10.1 The working of this policy will be monitored locally by the Designated Safeguarding Lead in the School who will report as required to the Head.

10.2 The GDST, as proprietor of the School, will undertake an annual audit visit and other periodic checks in order to monitor the effectiveness of the School's implementation of these policies and procedures, together with a review of the safeguarding incidents that have arisen and how they were managed.

10.3 The annual review will be reported back to the GDST's Audit Committee, which will monitor compliance. A member of the Audit Committee, who is also a member of the GDST Council, is nominated by Council as 'Safeguarding Lead' to take leadership responsibility for safeguarding at organisational level, delegating where appropriate to members of the Senior Management Team. The Health and Safety Committee will also consider the processes in place for promoting the welfare of GDST students.

10.4 The Girls' Day School Trust acknowledges its overall responsibility in ensuring that this Policy is effective in its implementation and meets all current regulatory requirements. An annual review of this Policy and associated procedures, and the efficiency with which associated duties have been discharged, will be undertaken so that any deficiencies or weaknesses can be remedied without delay.

10.5 This policy was last reviewed and updated on 23<sup>rd</sup> July 2019 and will be reviewed again in the event of any significant changes or by September 2020 at the latest. The School's most recent safeguarding audit visit took place on 13<sup>th</sup> March 2019.

## 11. Key Contacts

### 11.1 Designated Safeguarding Leads and RHSB contacts

Elizabeth Cunningham Senior School DSL	<a href="mailto:e.cunningham@rhsb.gdst.net">e.cunningham@rhsb.gdst.net</a> 01225 731024
Deborah Cowell SS Deputy DSL	<a href="mailto:d.cowell@rhsb.gdst.net">d.cowell@rhsb.gdst.net</a> 01225 731033
Emma Custodio SS Deputy DSL	<a href="mailto:e.custodio@rhsb.gdst.net">e.custodio@rhsb.gdst.net</a> 01225 731861
Daniel Rushworth Prep School DSL	<a href="mailto:d.rushworth@rhsb.gdst.net">d.rushworth@rhsb.gdst.net</a> 01225 731055
Michelle Fernandez EYFS DSL	<a href="mailto:m.fernandez@rhsb.gdst.net">m.fernandez@rhsb.gdst.net</a> 01225 731066
School Nurse Rebecca Purchase	<a href="mailto:r.purchase@rhsb.gdst.net">r.purchase@rhsb.gdst.net</a>

Acting Head of the whole school  
Hadrian Briggs

[h.briggs@rhsb.gdst.net](mailto:h.briggs@rhsb.gdst.net)

Head of the Prep School  
Claire Lilley

[c.lilley@rhsb.gdst.net](mailto:c.lilley@rhsb.gdst.net)

## 11.2 Trust Office – 020 7393 6666 (tel)

David Boyd (Director of Legal)  
[d.boyd@wes.gdst.net](mailto:d.boyd@wes.gdst.net)

Tel: 020 7393 6649

**Awaiting updating August 2019** (GDST Council Safeguarding Lead)

c/o Alison Smith [a.smith@wes.gdst.net](mailto:a.smith@wes.gdst.net)

Tel: 020 7393 6694

### People Department

Legal: [LegalDepartmentTrustOffice@UK.GDST.NET](mailto:LegalDepartmentTrustOffice@UK.GDST.NET)

Tel: 020 7393 6652

HR: [hrdepartment@wes.gdst.net](mailto:hrdepartment@wes.gdst.net)

Tel: 020 7393 6680

Innovation and Learning Department  
[innovationandlearning@wes.gdst.net](mailto:innovationandlearning@wes.gdst.net)

Tel: 020 7393 6688

## 11.3 Multi-agency contacts

### Bath and NE Somerset contacts:

<http://www.bathnes.gov.uk/services/children-young-people-and-families/child-protection>

In an emergency and if your DSL is unavailable, please call:

**B&NES Children and Families Duty and Assessment Team**  
**01225 396312 / 01225 396313**

If outside of office hours please call the **Emergency Duty Team** on

**01454 615165**

If a child or young person is in **immediate danger then please dial 999** and ask for police assistance

LADO

Sarah Hogan

**01225 396810** (Mon-Fri office hours)

B&NES CAMHS

**0117 3604040**

Local Police Avon and Somerset

**101 or 999** in an emergency

## 11.4 Neighbouring Local Authority Contacts

### South Gloucestershire contacts

South Gloucestershire Children's Services: **01454 868 008**

South Gloucestershire Children's Services Emergency/out of hours: **01454 615165**

Local Authority Designated Officer: **01454 866 000**

### **Swindon Contacts**

Swindon MASH: **01793 466903**

Swindon Out of Hours emergency duty service: **01793 466 900**

Local Authority Designated Officer: **01793 463 854**

### **Wiltshire Contacts**

Wiltshire MASH: **0300 456 0108**

Wiltshire Out of Hours Emergency Duty Service: **0300 456 0100**

### **Somerset Contacts**

Somerset Direct – Children’s Services Team: **0300 123 2224**

Somerset Out of Hours Emergency Duty Team: **0300 123 2224**

Local Authority Designated Officer is Anthony Goble: **0300 123 2224**

### **Bristol Contacts**

Bristol Safeguarding Children’s Board: **0117 903 6444**

Bristol Emergency Duty Team: **01454 615 165**

## **11.5 National organisations that offer guidance on specific Safeguarding Issues**

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example

NSPCC offers information for schools on the [TES website](https://www.nspcc.org.uk) and also on its own website <http://www.nspcc.org.uk>

[NSPCC helpline number for adult is 0808 800 5000](https://www.nspcc.org.uk) and [Childline is 0800 1111](https://www.nspcc.org.uk)

For safeguarding issues related to online safety CEOP [www.ceop.police.uk](http://www.ceop.police.uk)

The DfE dedicated telephone helpline and mailbox for non-emergency advice for staff and governors: **020 7340 7264** and [counterextremism@education.gsi.gov.uk](mailto:counterextremism@education.gsi.gov.uk)

Schools can also access broad government guidance on a number of issues related to Safeguarding via the GOV.UK website <https://www.gov.uk>

In addition to the training provided by the DSL, training for staff on Prevent and Channel can be found at [www.elearning.prevent.homeoffice.gov.uk](http://www.elearning.prevent.homeoffice.gov.uk)

The Counter Terrorism Security Advisor in this locality is Jo Johnson-Taylor.  
Telephone **01278 647 432**

NSPCC Whistleblowing Helpline: **0800 028 0285**

Citizens Advice Bureau (Bath branch): **0344 848 7919**

<b>Reviewed:</b> August 2019	<b>Next Review:</b> July 2020
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