



Cothill House Policy Documents

ISSR 7 & 8 Safeguarding

NMS for Boarding: 11.1, 14.1, 14.2, 14.3, 14.4, 14.5, 14.6, 15, 17.1

Date: January 2019

Next review: spring 2019

INTRODUCTION

“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. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.”

Keeping Children Safe in Education (September 2018)

“No single professional can have a full picture of a child’s needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action”

Keeping Children Safe in Education (September 2018)

“The designated safeguarding lead (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.”

Keeping Children Safe in Education (September 2018)

AIMS OF COTHILL HOUSE WITH REGARD TO SAFEGUARDING - CHILD PROTECTION

Children need to be safe and to feel safe in school and they have the right to be protected from harm. Children need support that matches their individual needs, including those who are at risk or may have experienced abuse.

The children's needs are paramount. They are at the heart of the safeguarding system and we must be prepared to listen to their concerns.

All children at Cothill House:

- have the right to speak freely and voice their values and beliefs.
- must be encouraged to respect each other's values and support each other.
- have the right to be supported to meet their emotional, and social needs as well as their educational needs: a happy, healthy, sociable child will achieve better educationally.

Schools can and do contribute to the prevention of abuse, victimisation, bullying, exploitation, extreme behaviours, discriminatory views and risk taking behaviours

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. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.

As a member of the Boarding Schools' Association, Cothill House abides by their *Commitment to Care Charter*. This can be found in the Policies folder in the shared area of the Google Drive.

According to *Working Together to Safeguard Children (2018)*, Children have said that they need:

- vigilance: to have adults notice when things are troubling them.
- understanding and action: to understand what is happening; to be heard and understood; and to have that understanding acted upon.
- stability: to be able to develop an ongoing stable relationship of trust with those helping them.
- respect: to be treated with the expectation that they are competent rather than not .
- information and engagement: to be informed about and involved in procedures, decisions, concerns and plans.
- explanation: to be informed of the outcome of assessments and decisions and reasons when their views have not met with a positive response.
- support: to be provided with support in their own right as well as a member of their family.
- advocacy: to be provided with advocacy to assist them in putting forward their views.
- protection: to be protected against all forms of abuse and discrimination and the right to special protection and help if a refugee.

As professionals, all Staff must be alert to the needs of the pupils and share appropriate information in a responsible and timely way.

No single professional can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

All school Staff should maintain an attitude of 'it could happen here' where safeguarding is concerned, and Staff must always seek to act in the best interests of the child.

All Staff have access to the Pastoral Report and Bullying Forms on the School Intranet. These can alert the Headmaster, Pastoral Head and DSLs to issues as they arise, and these personnel will provide feedback and advice to Staff as necessary. These forms are archived and remain on file for so long as necessary.

Staff are welcome to contribute to and help shape safeguarding arrangements and child protection policy. Speak to Richard Sutton, the **Designated Safeguarding Lead (DSL)**.

SCHOOL CONTACT DETAILS

Role	Name	Contact
Designated Safeguarding Lead (DSL) & Pastoral Deputy	Richard Sutton	ras@cothill.net 07711 199365
Deputy Designated Safeguarding Lead (DDSL)	Maria Bailey	mb@cothill.net 01865 390800
Headmaster	Duncan Bailey	dmb@cothill.net
Chair of Board of Trustees	Dr Ralph Townsend	rtownsend@cothilltrust.org 01865 390030
Designated Safeguarding Trustee	Dr Ralph Townsend	rtownsend@cothilltrust.org 01865 390030
Trust CEO	Tom Beardmore-Gray	tbeardmoregray@cothilltrust.org 01865 390720
Houseparent: Yr 4	Alex Kidd	ajbk@cothill.net
Houseparent: Yr 6 & 7	Kyle Langman	kml@cothill.net
Houseparents: Chandlings Yr 8	Adam & Fiona Asher	aka@cothill.net fpa@cothill.net 01865 326728
Houseparents: Bowlers Yr 5	Robbie & Alice Williams	remw@cothill.net amew@cothill.net
Houseparents: Sauveterre	Casey and Megan Brealy	cbrealy@sauveterre.net mbrealy@sauveterre.net 00 335 6262 5473
Head Matron	Jacqui Pridmore	jacqui@cothill.net 01865 390800
Senior Matron	Elaine Harris	elaine@cothill.net
Senior Matron	Amélie Kopff	amelie@cothill.net
Senior Matron	Yvonne Peacock	yvonne@cothill.net
Assistant Matron at Chandlings	Charelle Nairne	charelle@cothill.net
School Nurses	Rosi Sutton Hannah Fairlie Samantha Wing	rosi@cothill.net

EXTERNAL CONTACT DETAILS

Multi-Agency Safeguarding Hub (MASH) mash-childrens@oxfordshire.gcsx.gov.uk	0845 050 7666	
The Oxfordshire Safeguarding Children Board (OSCB) http://www.oscb.org.uk/	01865 815843	
Interim Local Authority Designated Officer (LADO): alison.beasley@oxfordshire.gov.uk	<i>Alison Beasley</i> 01865 323457	
<i>LADO Team - Emergency Duty Team</i>	0800 833 408	
<i>School Listener: Kate Carling</i>	01865 391271	
<i>Police</i>	101 or 999 (Emergencies)	
<i>Prevent (Radicalisation & Extremism) Non-emergency Advice</i> counterextremism@education.gsi.gov.uk	020 7340 7264	
<i>Childline</i>	0800 1111	
<i>National Bullying Helpline</i>	0845 225 5787	
<i>NSPCC 2/7 Helpline/Textline</i>	0808 800 5000	<i>Text: 88858</i>
NSPCC FGM Helpline fgmhelp@nspcc.org.uk	0800 028 3550	
Teaching Regulation Agency (TRA) https://teacherservices.education.gov.uk		
National Minimum Standards for Boarding Schools https://www.gov.uk/government/publications/boarding-schools-national-minimum-standards		

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1.

WHAT TO DO IF YOU ARE WORRIED A CHILD IS BEING ABUSED OR YOU BECOME AWARE OF A POTENTIAL SAFEGUARDING ISSUE

All Staff should be prepared to identify children who may benefit from early help. In the first instance, Staff should discuss early help requirements with the Designated Safeguarding Lead.

1.1. General

1.1.1.

If Staff members have any concerns about a child they will need to decide what action to take. Where possible, there should be a conversation with the DSL, or if not available, with the Deputy (DDSL) to agree a course of action, although any Staff member can make a referral to children's social care. If requested to do so, put your concerns in writing, with dates and details of these suspicions and pass to the DSL.

The DSL or their Deputy should always be available to discuss safeguarding concerns. If, in exceptional circumstances, the DSL (or Deputy) is not available, this must not delay appropriate action being taken

1.1.2

If a child is in immediate danger or is at risk of harm, a referral should be made to children's social care and/or the police immediately. Anyone can make a referral. Where referrals are not made by the DSL, the DSL should be informed as soon as possible that a referral has been made.

1.1.3.

It is important to remember, that *Keeping Children Safe in Education* (KCSIE - Sept 2018) advises that anyone can make a referral to social care and all staff should be aware of the process of doing so.

All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

It is normal for concerns to be raised with and managed by the DSL. However, if you remain concerned, you can refer your concerns directly to the Oxfordshire Safeguarding Children Board (OSCB), if related to a child in need, or the Local Authority Designated Officer(s) (LADO), if related to an allegation regarding an adult. (Contact details on Page 5).

1.2. On a disclosure regarding a child/pupil in need or at risk:

1.2.1.

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual, his or her abuser may have threatened them, they may have lost all trust in adults, or they may believe, or have been told, that the abuse is his or her own fault.

1.2.2.

If a child talks to you about any risks to their safety or wellbeing you will need to let them know that you may pass the information on – you are not allowed to keep secrets. Confidentiality cannot be

promised to a child making a disclosure. The point at which you do this is a matter for professional judgement.

1.2.3. During your conversation with the child:

- allow a child to speak freely and lead the discussion, never stop a child who is freely recalling significant events and do not press for details by asking questions, e.g. 'What did they do next?' Avoid asking leading questions.
- remain calm and do not over react as a child may stop talking if they feel they are upsetting you.
- listen and be supportive; give reassuring nods or words of comfort e.g. 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'.
- accept what the child says without challenge, and reassure them that they are safe, that they are doing the right thing and that you recognise how hard it is for them.
- do not promise complete confidentiality, although you can explain that they have done the right thing and tell them that you will only be passing this information onto the appropriate person within school in order to keep him or her and other children safe.
- do not admonish the child for not disclosing earlier. Saying 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be your way of being supportive, but a child may interpret it that they have done something wrong.
- do not be afraid of silences, remember how hard this must be for a child.
- when asking questions always ask open questions using the TED principle of 'Tell' me, 'Explain' to me, 'Describe' to me.
- make careful and detailed legible notes as they may be needed later. Record the date, event, observation, disclosure and action taken. Name anyone else present, sign it and hand it to the DSL as soon as possible.
- don't investigate, although you may use questions such as, 'Is there anything else you'd like to tell me?'
- do not offer any physical touch as comfort, it may be anything but comforting to a child who has been abused.
- do not lay blame or criticise either the child or the perpetrator.
- tell a child what will happen next and he or she may agree to go with you to see the DSL. Otherwise, let him or her know that someone will come to see them before the end of the day.

1.2.4.

Do not discuss the matter with anyone else.

1.2.5.

Report the information immediately to the DSL (or DDSL if DSL is away). The DSL (or Head) will then make any appropriate contact with the Oxfordshire Safeguarding Children Board (OSCB) immediately (or certainly within one working day) for advice, or to make a referral. Parental consent is not required before any contact with, or referral to, the LSCB.

1.2.6.

If a child is at risk the DSL (or Head) will make a referral to the LSCB immediately.

1.2.7.

If a crime may have been committed, the DSL must report the matter to the police immediately.

1.2.8.

It is not the responsibility of the school to investigate suspected cases of abuse. It is, however, our responsibility to follow local safeguarding procedures and to recognise that a child telling you he or

she has been abused may be the beginning of a legal process, as well as of a process of recovery for the child. Legal action against the perpetrator can be seriously damaged by any suggestion that the child's account has in any way been influenced by the person he or she has told.

1.2.9.

The school will not undertake their investigations of any disclosure of allegation without prior consultation with, and advice from, the LSCB (or LADO).

1.2.10.

Please seek support if you feel distressed, and follow up with the DSL if you remain concerned.

1.3. On receiving an allegation against anyone working in the school (including temporary and volunteer staff):

1.3.1.

Allegations against Staff, volunteers must be reported straight away to the DSL, DDSL, or, in their absence, the Head or Chair of the Board of Trustees. (Please see points '1.3.5' and '1.3.6' below).

1.3.2.

Either the Head / DSL or the DDSL will seek immediate advice immediately (and certainly within one working day) from, or make a referral to, the LADO. The LADO will then advise the school and preside over the investigation of any such allegation or suspicion of abuse. Parental consent is not required before any contact with, or referral to, the LADO.

1.3.3.

If a child is at immediate risk the DSL will liaise with the Head and make a referral to the LSCB immediately.

1.3.4.

If a crime may have been committed, the DSL (or the DDSL) must liaise with the Head and report the matter to the police immediately.

1.3.5.

If you suspect or become aware of an allegation of child abuse made against the DSL, then the Head and Trust CEO on behalf of the Chair of Trustees must immediately be informed (without informing the DSL). The Head / CEO will liaise with the LADO.

If you suspect or become aware of an allegation of child abuse made against the DDSL (the Head's wife), then the Trust CEO on behalf of the Chair of Trustees must immediately be informed (without informing the Head or DDSL). The CEO will liaise with the LADO.

1.3.6

If you suspect or become aware of an allegation of child abuse made against the Head, then the Trust CEO on behalf of the Chair of the Board of Trustees must immediately be informed (without informing the Head or DDSL, who is the Head's wife).

1.3.7.

Staff who are concerned about the conduct of a colleague towards a child are undoubtedly placed in a very difficult situation. The welfare of the child is however paramount. The Trust's whistleblowing policy enables Staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place.

1.3.8.

If the concerns prove to be unfounded, Staff should not reproach themselves for having raised the issue. In cases of this nature it is always better to be safe than sorry.

1.4. On receiving a disclosure regarding abuse by one or more pupils against another pupil:

1.4.1.

Additional guidance on peer on peer abuse is in Appendix D of this policy. The school's anti-bullying procedures should be followed. However, when there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm this may warrant a response under Safeguarding (Child Protection), in addition to the anti-bullying procedures.

1.4.2.

Follow the same advice as in 1.2 above when listening to the child and inform the DSL. The Safeguarding (Child Protection) procedures set out in this document will then be followed.

2.

ADDITIONAL ADVICE FOR STAFF DEALING & WORKING APPROPRIATELY WITH PUPILS

2.1.

Staff should be fully aware of Safeguarding (Child Protection) issues. Staff should avoid putting themselves (or indeed children) in a vulnerable position. For example:

2.1.1.

Staff should avoid a situation when they are 1:1 with a child in an enclosed environment.

2.1.2.

When coaching games, Staff should avoid close personal contact when demonstrating technique.

2.1.3.

Staff should not communicate with children on social media or personal emails.

2.1.4.

Staff should not divulge personal details (such as personal phone numbers, email addresses) to children.

2.1.5.

Staff should avoid any contact with children, outside of the school, which is not school related.

2.1.6.

Staff should avoid creating personal friendships with children, and should aim to keep relationships with children on a professional level.

2.1.7.

Staff teaching individual music or other subject lessons should be particularly aware and not place themselves or children in a vulnerable position.

2.1.8

No member of staff should either view or forward illegal images of a child.

2.1.8.

Please also refer to the Staff Code of Professional Conduct policy.

3.

ACTIONS BY THE DSL. OR, IF APPLICABLE, THE DDSL, HEADMASTER OR CHAIR OF TRUSTEES

If early help is appropriate, the Designated Safeguarding Lead (DSL) will support the Staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate.

3.1.

On receiving a disclosure regarding a child/pupil in need or at risk

3.1.1.

On receipt of a disclosure or a serious concern about the safety or well-being of a child the DSL / DDSL will liaise with the Head and consult the LSCB immediately or certainly within one working day. (There is no requirement for the parents to be informed first or permission to be sought before contacting the LSCB).

3.1.2.

In borderline cases of lower level concern, discussions with the LSCB will be held informally, without naming the individual and in this way advice can be sought.

If early help or other support is appropriate, the case will be kept under constant review and consideration given to a referral to children's social care if the child's situation does not appear to be improving.

3.1.3.

If a child is at immediate risk the DSL / DDSL will liaise with the Head and make a referral to the LSCB immediately.

3.1.4.

The DSL / DDSL will liaise with the Head immediately and contact the Police regarding any criminal matters, such as a child being at immediate risk or of being harmed.

3.1.5.

With regard to a concern regarding FGM, the Police must be informed immediately (Phone 101).

3.1.6.

With regard to a concern regarding radicalisation and/or extremism the police must be informed immediately (Phone 101).

3.2. On receiving an allegation regarding anyone working in the school:

3.2.1.

On receipt of a Safeguarding (Child Protection) related allegation against a member of Staff, or any employee of the school, or any volunteer, the DSL will liaise with the Head and consult the LADO immediately or certainly within one working day. The LADO will then advise the school and preside over the investigation of any such allegation or suspicion of abuse. (There is no requirement for the parent to be informed first or permission to be sought before contacting the LADO).

3.2.2.

Where the school has 'low level' concerns that do not amount to allegations or suspicions of specific abuse, but which may indicate the possibility of abuse occurring, the DSL will liaise with the Head and discuss these concerns with the LADO, which may firstly be an enquiry with 'no names'.

3.2.3.

The DSL will immediately liaise with the Head and contact the police regarding any criminal matters, including in the case of any serious harm occurring or if there is a child at risk of immediate harm.

3.2.4.

The school (Head / DSL) must report to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer) whose services are no longer used because s/he is considered unsuitable to work with children, within one month of leaving the school.

3.2.5.

The school (Head / DSL) must consider making a referral to the Teaching Regulation Agency (TRA) where a teacher has been dismissed or resigned before he/she would have been dismissed. In circumstances where unacceptable professional conduct, conduct that may bring the profession into disrepute or if there is a conviction for a relevant offence, a referral must be made. Records concerning allegations of sexual abuse will be kept for ten years, or until the accused has reached normal pension age.

4.

THE DESIGNATED SAFEGUARDING LEAD'S ROLES & RESPONSIBILITIES: A 'JOB DESCRIPTION'

The Designated Safeguarding Lead (DSL) is an appropriate senior member of staff, from the SMT. He/she has a legal responsibility for dealing with safeguarding issues, providing advice and support to staff, liaising with the Local Authority, and working with a range of other agencies. The Designated Safeguarding Lead need not be a teacher but must have the status and authority within the management structure to carry out the duties of the post.

The role of the DSL is in accordance with Annex B of KCSIE (Sept 2018). The ultimate lead responsibility for safeguarding and child protection remains with the DSL. This responsibility should not be delegated

Deputy DSLs (DDSLs) will be trained to the same standard as the (DSL) and have the same responsibilities as the DSL.

Manage referrals

The designated safeguarding lead is expected to:

- liaise with Head and refer cases of suspected abuse to the local authority children's social care as required.
- support staff who make referrals to local authority children's social care.
- refer cases to the Channel programme where there is a radicalisation concern as required & support staff who make such referrals.
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required.
- refer cases where a crime may have been committed to the Police as required.
- Safeguarding (Child Protection) information will be dealt with in a confidential manner. Staff will be informed of relevant details only when the DSL feels their having knowledge of a situation will improve their ability to deal with an individual child and/or family. A written record will be made of what information has been shared with whom, and when. Fears about sharing information will not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.
- Safeguarding (Child Protection) records will be stored securely in a central place, separate to academic records. Individual files will be kept for each child: the school will not keep family files. Files will be kept for at least the period during which the child is attending the school, and beyond that in line with current data legislation and guidance.
- Access to these records by Staff other than by the DSL will be restricted, and a written record will be kept of who has had access to them and when.

- Communication with parents will be in line with guidance given by LADO or the OLSCB and appropriate to each individual case. The DSL will not disclose to a parent any information held on a child if this would put the child at risk of significant harm.

Work with others

The designated safeguarding lead is expected to:

- liaise with the Headmaster to inform him of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- as required, liaise with the case manager and the designated officer at the local authority for child protection concerns, in cases which concern a staff member.
- liaise with staff, especially support staff, matrons, nurses, IT Technicians and the SENCO on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies.
- will liaise with the Head of IT in providing E-Safety policies for the school.
- act as a source of support, advice and expertise for all staff.

Training

The designated safeguarding lead (and any deputies) will undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years.

The designated safeguarding lead should undertake Prevent awareness training.

In addition to the formal training set out above, the DSL and DDSL's knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- ensure each member of staff has access to, and understands, the school child protection policy and procedures, especially new and part time staff.
- co-ordinate staff training and be responsible for ensuring that all staff (including temporary, and volunteer staff) receive regular update training (every three years), in accordance with the

requirements of the OSCB. Names of Staff who attend such INSET sessions will be noted by the DSL, and any non-attendance must be followed up immediately.

Most recent whole staff training provided: January 2017

- ensure that volunteers working in the school are made aware of Safeguarding (Child Protection) policy and arrangements.
- are alert to the specific needs of children in need & those with special educational needs.
- are able to keep detailed, accurate, secure written records of concerns and referrals.
- understand and support the school with regard to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation.
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school.
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation.
- obtain access to resources and attend any relevant or refresher training courses.
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

Raise Awareness

The designated safeguarding lead should:

- ensure the school's child protection policy is known, understood and used appropriately.
- ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with Trustees to ensure this.
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this.
- link with the OSCB to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

Reporting to Trustees

- The DSL provides an annual update to the Board of Trustees on Safeguarding (Child Protection) matters including assisting the whole Board of Trustees in their annual review of Safeguarding (Child Protection).

Child protection file

Where children leave the school, ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.

In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

Availability

During term time the DSL (or deputy) should always be available (during school hours) for staff in the school to discuss any safeguarding concerns. Availability via phone is acceptable.

It is a matter for the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

5.

ROLE & RESPONSIBILITIES OF THE CHAIR (AND WHOLE) BOARD OF TRUSTEES

The Trustees will ensure there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare at Cothill.

5.1.

Ensure the contact address of the Trust CEO (acting on behalf of the Chair of the Board of Trustees) is available to all Staff, parents, carers and guardians.

5.2.

Know and understand the Safeguarding (Child Protection) procedures to be undertaken, if there is an allegation or disclosure raised, such as an allegation against the Head.

5.3.

Ensure there is/are member(s) of the board of Trustees with designated Safeguarding (Child Protection) role(s).

5.4.

To contact the LADO immediately, or within one working day, if there is a Safeguarding (Child Protection) allegation against the Head / DSL.

5.5.

Undertake an annual review by the whole Board of Trustees (who have collective responsibility) of the Trust's overarching, and each individual Trust school's, Safeguarding (Child Protection) policy, to ensure the safety and well-being of the pupils and regulatory compliance.

5.6.

Undertake an annual review, by the whole Board of Trustees (who have collective responsibility), of each Trust schools' implementation of their Safeguarding (Child Protection) policy, to ensure the safety and well-being of the pupils and regulatory compliance.

The Trustees recognise the importance of information sharing between professionals and local agencies. Further details on information sharing can be found in Chapter one of 'Working Together to Safeguard Children' and in 'Information Sharing Advice for Safeguarding Practitioners'.

6.

ROLE AND RESPONSIBILITIES OF THE DESIGNATED SAFEGUARDING TRUSTEE

6.1.

Visit their designated Trust school (or schools) on an annual basis to check compliant implementation of their individual Safeguarding (Child Protection) policies.

6.2.

The Designated Safeguarding Trustee(s) provide(s) annual update(s) to the Board of Trustees on Safeguarding (Child Protection) matters including assisting the whole Board of Trustees in their annual review of Safeguarding (Child Protection).

7.

TYPES OF ABUSE AND PUPILS IN NEEDS OR AT RISK

Children in need

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled.

Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

Children suffering or likely to suffer significant harm

Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour based violence, and extra-familial threats like radicalisation and sexual Exploitation.

Definitions of abuse and signs of a child in need or at risk and in danger:

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

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

Note that abuse can take place wholly online or technically may be used to facilitate offline abuse.

- Physical abuse.
- Emotional abuse.
- Sexual abuse.
- Physical neglect.
- Child sexual exploitation (CSE).
- Preventing radicalization and extremism and its reporting.
- Female genital mutilation (FGM) and its reporting.
- Honour Based Violence & Forced Marriage.
- Self-harm.
- Peer on peer abuse
- Sexual Violence & Sexual Harassment between children
- Child Drug Exploitation & Gangs
- Child Trafficking & Modern Slavery

A. Physical abuse and indicator signs

I.

Physical abuse, including peer on peer abuse, may involve hitting, kicking, biting, hair pulling, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.

II.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

III.

Indicators may include:

- injuries that are not consistent with the explanation offered.
- injuries not consistent with the child's age and development.
- repeated injuries over a period of time.
- runaway attempts and fear of going home.
- stilted conversation, vacant stares or no attempt to seek comfort when hurt.
- describes self as bad and deserving to be punished.
- the child cannot recall how injuries occurred or offers an inconsistent explanation.
- wariness of adults.
- frequent absence from school.
- flinching if touched unexpectedly.
- extremely aggressive or withdrawn.
- displays of indiscriminate affection-seeking behaviour.
- abusive behaviour and language in play.
- over compliance and/or eagerness to please.
- poor sleeping patterns, fear of the dark, frequent nightmares.
- sadness, frequent crying.
- depression.
- poor memory and concentration.

B. Emotional abuse and indicator signs

I.

Emotional abuse is the persistent emotional, maltreatment of a child such as to cause severe and adverse effects on the child's emotional development.

II.

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.

III.

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.

IV.

It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber-bullying), 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.

V.

Indicators may include:

- Bedwetting and/or diarrhoea.
- Frequent psychosomatic complaints, headaches, nausea, abdominal pains.
- Mental or emotional development lags.
- Behaviours inappropriate for age.
- Fear of failure, over high standards, reluctance to play.
- Fears consequences of actions, often leading to lying.
- Extreme withdrawal or aggressiveness, mood swings.
- Overly compliant, too well-mannered.
- Excessive neatness and cleanliness.
- Extreme attention-seeking behaviours.
- Poor peer relationships.
- Severe depression, may be suicidal.
- Runaway attempts.
- Violence features as a subject for art or writing.
- Complains of social isolation.

C. Sexual abuse and indicator signs

I.

Sexual abuse involves forcing or enticing a child or younger person to take part in sexual activities, not necessarily involving high level of violence, whether or not the child is aware of what is happening.

II.

The activities may involve physical contact, including assault by penetration (e.g. rape, or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

III.

They may also include non-contact activities, such as involving children in looking at, or in the production of sexual images, watching sexual activities, or 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, and is not solely perpetrated by adult males.

The sexual abuse of children is a specific safeguarding issue in education (see parts E, K and L of this appendix).

IV.

Indicators may include:

- contact with other children is forbidden.
- fatigue due to sleep disturbances.
- sudden weight change.
- cuts or sores made by the child on the body (self-mutilation).
- recurring physical ailments.
- difficulty in walking or sitting.
- unusual or excessive itching in the genital or anal area due to infection(s).
- torn, stained or bloody underwear.
- injuries to the mouth, genital or anal areas (eg bruising, swelling, sores, infection).
- sudden lack of interest in friends or activities.
- hostility toward authority figures.
- the need for constant companionship.
- regressive communication patterns (eg speaking childishly).
- academic difficulties or performance suddenly deteriorates.
- truancy and/or running away from home.
- wearing layers of clothing to hide bruises.

The following list of indicators is not exhaustive or definitive but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual abuse.

Signs include:

- inappropriate sexual or sexualised behaviour.
- receiving unexplained gifts or gifts from unknown sources.
- having multiple mobile phones and worrying about losing contact via mobile.
- having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs).

- changes in the way the child dresses.
- getting in/out of different cars driven by unknown adults.
- contact with known perpetrators.
- involvement in abusive relationships, intimidated by and fearful of certain people or situations.
- associating with groups of older people, or anti-social groups, or with other vulnerable peers.
- truancy, exclusion, disengagement with school, opting out of education altogether.
- unexplained changes in behaviour or personality (chaotic, aggressive, sexual).
- mood swings, volatile behaviour, emotional distress.
- self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders.
- injuries from physical assault, physical restraint, sexual assault.

D. Physical Neglect and/or Psychological Neglect: indicator signs

I.

Neglect is 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.

II.

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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

III.

Indicators may include:

- unattended medical and dental needs.
- consistent lack of supervision.
- consistent hunger.
- nutritional deficiencies.
- inappropriate dress for weather conditions.
- poor hygiene.
- persistent (untreated) conditions (eg head lice or other skin disorders).
- development delays (eg language, weight).
- irregular or non-attendance at school or lateness.
- demands for constant attention and affection.
- lack of parental participation and interest.
- regular displays of fatigue or listlessness, falling asleep in class.
- lack of trust in others, unpredictable.

E. Child sexual exploitation (CSE)

I.

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.

II.

Like all forms of child sex abuse, child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity
- can take place in person or via technology, or a combination of both
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media)
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

III.

Some of the following signs may be indicators of child sexual exploitation:

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

F. 'Prevent duty' with regard to radicalization and extremism, and its reporting

I.

The school will, in the exercise of its functions, have due regard to the need to prevent members of Staff and pupils from being drawn into terrorism.

II.

Extremism is 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.

III.

Cothill will build pupils' resilience to radicalisation by providing a safe environment for debating controversial issues & helping them understand how they can influence and participate in decision making.

Educate Against Hate, a website launched by the government has been developed to support and equip school and college leaders, teachers, and parents with information, tools and resources (including on the promotion of fundamental British values) to help recognise and address extremism and radicalisation in young people. The platform provides information on and access to training resources for teachers, staff and school and college leaders, some of which are free such as Prevent e-learning, via the Prevent Training catalogue.

IV. Indicators may include:

- disclosures by pupils of their exposure to the extremist actions.
- graffiti symbols, writing or art work promoting extremist messages or images.
- pupils accessing extremist material online, including through social media.
- parental reports of changes in behaviour.
- pupils voicing opinions drawn from extremist ideologies and narratives.
- use of extremist or 'hate' terms to exclude others or incite violence.
- intolerance of difference, whether secular or religious or, in line with the school's equal opportunities policy.
- attempts to impose extremist views or practices on others.
- anti-Western or anti-British views.

Cothill will ensure that the Designated Safeguarding Lead undertakes Prevent awareness training and is able to provide advice and support to other members of staff on protecting children from the risk of radicalisation.

(See *The Prevent Duty*, June 2015)

G. Domestic Violence and Abuse

I.

The definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial; and
- emotional

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

II.

Advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/domestic-abuse/signs-symptoms-effects/>

<http://www.refuge.org.uk/get-help-now/support-for-women/what-about-my-children/>

<http://www.safelives.org.uk/knowledge-hub/spotlights/spotlight-3-young-people-and-domestic-abuse>

H. Female genital mutilation (FGM) and its reporting
and multi-agency statutory guidance on fgm (April 2016)

I.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

II.

Staff need to be aware of FGM practices and the needs to look for signs, symptoms and other indicators of FGM either with regard to the pupils (if applicable) or with regard to the Staff employed at the school.

III.

If a member of Staff is informed by a girl under the age of 18 that she has undergone an act of FGM or they observe physical signs that an act of FGM may have been carried out on a girl under the age of 18, there is a mandatory duty to report any such cases, without delay, to the police (phone: 101).

Female Genital Mutilation mandatory reporting duty for teachers

Whilst all staff should speak to the DSL (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers.

11 If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. See Annex A for further details.

IV.

Indicators may include a girl or woman:

- having difficulty walking, sitting or standing.
- spending longer than normal in the bathroom or toilet.
- having unusual behaviour after an absence from school or college.
- being particularly reluctant to undergo normal medical examinations.
- asking for help, but may not be explicit about the problem due to embarrassment or fear.

V.

If a member of Staff is worried or concerned about FGM please ring for help on: 0800 028 3550 or email at: fgmhelp@nspcc.org.uk.

Information on how to make a mandatory report is set out in the Home Office document at: www.gov.uk/government/publications/fgm-mandatory-reporting-in-healthcare

I. Honour Based Violence and Forced Marriage

See *Multi-agency practice guidelines: Handling cases of Forced Marriage* (June 2014) and *multi-agency statutory guidance on fgm* (April 2016)

I.

Honour-based violence (HBV)

This embraces a variety of crimes of violence (mainly but not exclusively against women), including assault, imprisonment and murder where the person is being punished by their family or their community. They are being punished for actually, or allegedly, undermining what the family or community believes to be the correct code of behaviour.

In transgressing this correct code of behaviour, the person shows that they have not been properly controlled to conform by their family and this is to the “shame” or “dishonour” of the family.

If staff have a concern regarding a child that might be at risk of HBV or who has suffered from HBV, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children’s social care.

II

Forced marriage

A forced marriage is a marriage in which one or both spouses do not consent to the marriage but are coerced into it. Duress can include physical, psychological, financial, sexual and emotional pressure.

In cases of vulnerable adults who lack the capacity to consent to marriage, coercion is not required for a marriage to be forced.

III

Given the nature of the School’s demographic, it is deemed unlikely that either items G or H will be issues at Cothill. However, as with all Safeguarding issues, Staff with concerns must raise them immediately with the DSL.

J. Self-harm

I.

Self-harm is any behaviour where the intent is to deliberately cause self-harm.

II.

Self-harm can be a transient behaviour in young people that is triggered by particular stresses and resolves fairly quickly, or it may be part of a longer term pattern of behaviour.

III. Indicators may include a child:

- showing changes in eating/sleeping habits.
- showing increased isolation from friends/family or giving away possessions
- showing changes in activity and mood (e.g. more aggressive).
- showing a lowering of academic grades.
- talking about self-harming or suicide.
- becoming socially withdrawn.
- expressing feelings of failure, uselessness or loss of hope.

K. Peer on Peer Abuse

I.

All staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to:

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

Staff should also be aware that there are different gender issues that can be prevalent when dealing with peer on peer abuse.

All staff should recognise that children are capable of abusing their peers. All staff should be clear about Cothill policies and procedures with regard to peer on peer abuse.

II.

Cothill House seeks to minimise all risks of peer to peer abuse and believes that all peer on peer abuse is wholly unacceptable and will not be tolerated. Any instances of such abuse will be taken seriously and both victim and perpetrator will receive support.

The Countering Bullying policy makes clear how such abuse is viewed, managed and dealt with in the school. Importantly, this policy states:

1. *That abuse is abuse and should never be tolerated or passed off as banter, just having a laugh or part of growing up.*

2. *Prevention*

- *An ordered and disciplined environment is essential, opportunities for bullying [abuse] will then not occur.*
- *Particular attention must be paid to the times when boys are together in unsupervised groups: before a lesson, in a queue, changing for games, etc.*
- *Staff will receive training to help ensure that this policy is understood and implemented. Staff are encouraged, when on duty, to patrol effectively.*
- *Elements of PSHE teaching will help Staff and boys talk about - and deal with - incidents of bullying [and abuse]. Form teachers play a crucial role here. See the policy on Listening.*
- *Teaching in Assemblies (Prayers) by the Headmaster or Chaplain.*
- *Boys should be encouraged to recognise that bullying [abuse] is unacceptable. 'Telling tales' may be one thing, but boys should feel able to speak out to members of Staff should they so desire.*
- *A sheet entitled What is Bullying? is on display in every form room.*
- *Drawing attention to any undesirable developments among the boys at Staff meetings.*
- *The recording of all serious incidents*

L. Sexual Violence and Sexual Harassment between Children

I. Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk.

Evidence shows girls, children with SEND and LGBT children are at greater risk.

II.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is *not* an inevitable part of growing up
- not tolerating or dismissing sexual violence or sexual harassment as banter, part of growing up, just having a laugh or boys being boys
- challenging behaviours such as inappropriate touching.

III.

What is Sexual violence and sexual harassment?

Sexual violence

Rape

Assault by Penetration

Sexual Assault: committing an offence of sexual assault by intentionally touching another person when the touching is sexual and is non-consensual.

What is consent?

Consent is about having the freedom and capacity to choose.

Consent can be withdrawn at any time during sexual activity and each time activity occurs.

Sexual harassment

Sexual harassment is unwanted conduct of a sexual nature that can occur online and offline. Child on child sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, etc
- sexual jokes or taunting
- physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes & displaying pictures of a sexual nature
- online sexual harassment, including:
non-consensual sharing of sexual images and videos
sexualised online bullying

unwanted sexual comments and messages, including, on social media
sexual exploitation; coercion and threats

IV.

The response to a report of sexual violence or sexual harassment

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they should follow the referral process as set in Part 1 of this policy.

As is always the case, if staff are in any doubt as to what to do they should speak to the designated DSL or deputy.

M. Child Drug Exploitation

Taken from:

Criminal exploitation of children and vulnerable adults: county lines (Home Office July 2017)

I.

County lines is the police term for urban gangs supplying drugs using dedicated mobile phone lines or 'deal lines'. It involves child criminal exploitation (CCE) as gangs use children and vulnerable people to move drugs and money. Gangs establish a base in the market location, typically by taking over the homes of local vulnerable adults by force or coercion.

During term time in a boarding school, boys are protected from the influence of violent gangs, but Staff must nonetheless look at the indicators outlined in (iii) below.

II.

How does it affect young people?

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years
- can still be exploitation even if the activity appears consensual
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence
- can be perpetrated by individuals or groups, males or females, and young people or adults, and is typified by some form of power imbalance in favour of those perpetrating the exploitation.

One of the key factors found in most cases of county lines exploitation is the presence of some form of exchange (e.g. carrying drugs in return for something). Where it is the victim who is offered, promised or given something they need or want, the exchange can include both tangible (such as money, drugs or clothes) and intangible rewards (such as status, protection or perceived friendship or affection). It is important to remember the unequal power dynamic within which this exchange occurs and to remember that the receipt of something by a young person does not make them any less of a victim.

III.

Signs to look out for:

A young person's involvement in county lines activity often leaves signs. Some indicators of county lines involvement and exploitation include:

- Persistently going missing from school or home and / or being found out-of-area
- Unexplained acquisition of money, clothes, or mobile phones
- Relationships with controlling / older individuals or groups
- Leaving home / care without explanation
- Suspicion of physical assault / unexplained injuries
- Parental concerns
- Carrying weapons
- Significant decline in school results / performance
- Gang association or isolation from peers or social networks
- Self-harm or significant changes in emotional well-being

N. Child trafficking & Modern Slavery

I.

Trafficking of persons shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation, sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.

(Safeguarding children who may have been trafficked HM Government 2011)

Modern slavery encompasses slavery, servitude, forced and compulsory labour and human trafficking. Traffickers and slave drivers coerce, deceive and force individuals against their will into a life of abuse, servitude and inhumane treatment. *(Modern Slavery HM Government 2014)*

II.

Cothill House is committed to ensuring that no child taught at Cothill is a victim of modern slavery or human trafficking. Furthermore, Cothill is committed to ensuring that there is no modern slavery or human trafficking in any part of the school.

Remember!

What to do if you have any concerns:

Contact the school DSL (Richard Sutton) who has the responsibility for linking in with your local authority's social care services. If you believe a person is in immediate risk of harm, you should contact the police.

NSPCC and Childline also offer sources of support for young people.

8.

OVERVIEW OF HOW THE SCHOOL PROMOTES A SAFE ENVIRONMENT

8.1. General

8.1.1.

The School's role in safeguarding the welfare of children begins in creating an environment where children are safe from harm, in establishing a culture where they can raise any anxieties with confidence and incorporating child protection issues in the classroom.

8.1.2.

All Staff should maintain an attitude of 'it could happen here' where safeguarding is concerned and Staff must always seek to act in the best interests of the child. Staff endeavour to ensure a culture of vigilance.

8.1.4.

All Staff should have an awareness of safeguarding issues, some of which are listed in Appendix D. Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger.

8.1.4.

Corporal punishment of any kind is prohibited in the school.

8.2. Educating the pupils in Safeguarding (Child Protection)

8.2.1.

As part of the the school curriculum, Personal, Social, Health Education (PSHE) sessions, teaching in various subjects, tutor/form periods, visiting speakers and assemblies, help to inform pupils about issues such as:

- sexual activity.
- grooming techniques.
- online e-safety.
- drug use.
- building resilience to the risks of radicalization and extremism.
- keeping themselves safe.

8.2.2.

There are also many opportunities for pupils to discuss issues and to form and develop their own opinions, in an informal way.

8.3. Listening to the pupils and making them aware

8.3.1.

We are a 'sharing school' where all pupils are encouraged (in Prayers/Assembly, lessons and when matters arise) to share any concerns they may have. Children's viewpoints are listened to and valued.

8.3.14.

Parental contact is encouraged and extensive. This provides an opportunity for parents to raise concerns raised by their children.

8.4. Safer recruitment of Staff

8.4.1.

All Staff who work in the school, including teaching and non-teaching, governors, temporary Staff and volunteers, will be checked through the Disclosure and Barring Service (DBS) for an Enhanced Disclosure and a Barred List check, and have all other required regulatory checks completed, including appropriate identity checks, before they start work at the school (according to the school safer recruitment policy). (Volunteers who are not engaged in regulated activity may be exempt certain checks).

8.4.2.

A Staff member can only start work at the school when all of these regulatory checks have been appropriately completed. However, in specific (and rare) circumstances, a Staff member may start work at the school pending the return of their enhanced disclosure, provided the 'Barred list' check has been completed and that the Staff member has understood and signed a controlled access agreement - this exemption does not apply to Boarding and Early years).

8.4.3.

All Staff will undertake a probationary period, during which time they will receive instruction in the implementation of this Safeguarding (Child Protection) policy.

8.5. Welfare, health and safety

8.5.1.

The school is committed to ensuring the welfare, health and safety of its Staff and pupils. The school will, so far as is reasonably practicable, establish procedures and systems necessary to implement this commitment and to comply with its statutory obligations on health and safety.

8.5.2.

While the School will take all reasonable steps to ensure the health and safety of its employees, health and safety at work is a responsibility of all Staff themselves. It is the duty of each Staff member to take reasonable care of their own and other people's welfare, health and safety and to report any situation which may pose a serious or imminent threat to the well-being of themselves, other Staff or the pupils.

8.5.3.

The school also recognises its duty to protect the health and safety of all visitors to the School, including parents, contractors and temporary workers, as well as any members of the general public.

8.5.4.

Assurances are obtained by the School that all appropriate child protection procedures apply to Staff employed by other organisations who work with our pupils on other sites. (eg residential trips).

8.5.5.

All necessary risk assessments must be undertaken to help ensure that the school environment is safe environment for both Staff and pupils.

8.5.6.

Continuing progress has been made to secure, in so far as practicable for our location, the grounds surrounding the main buildings, including enhanced awareness and security of all doors on site.

8.5.7.

Please see the school's Health and Safety Policy for further details.

8.6. Safe internet use and IT 'filtering' protection systems

8.6.1.

There is a school policy for controlled access and appropriate use of the internet. (See the E-Safety Policy for further details). Staff are given regular update training by the DSL on Safer Social Networking.

8.6.2.

The school has internet filtering and protection systems in place, to help prevent inappropriate access and to monitor and take action regarding inappropriate use.

8.6.3

Sexting: pupils do not have access to their mobile phones whilst at school & therefore no access to 3G/4G networks. However, the Head of ICT oversees the delivery of E-Safety and promotes an awareness and commitment to E-Safeguarding throughout the School community. See Policies on Photographing Images of Pupils & the E-Safety Policy.

8.6.4.

Karl Hopwood of *ChildNet International* speaks annually to Years 6, 7 & 8 regarding E-Safety. On the same day, the parental body is invited to attend an address by Mr. Hopwood.

8.7. Whistleblowing

8.7.1.

Whistle-blowing is the mechanism by which Staff can voice their concerns, made in good faith, without fear of repercussion. *The school has a Whistleblowing Policy.*

8.7.2.

Staff have individual responsibilities to bring matters of concern to the attention of the Senior Management (including the DSL) and/or relevant external agencies. This is particularly important where the welfare of children may be at risk.

8.7.3.

If the matter concerns a member of the Senior Management, it should be brought to the attention of the Chair of the Board of Trustees. If the concern relates to the Chair of the Board of Trustees, it should be brought to the attention of the CEO of the Cothill Trust who will refer it to the Local Authority.

8.7.4.

Please refer also to the Trust's Whistleblowing policy.

8.7.5.

Where a Staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them. The NSPCC whistleblowing helpline is available on 0800 028 0285 (8:00am to 8:00pm, Monday to Friday) and email: help@nspcc.org.uk

8.8. Visiting speakers

8.8.1.

Information on the speaker or institution must be provided and known in advance.

8.8.2.

This must align with the ethos of the school and to British values, taking the radicalization and extremism 'Prevent Duty' into account.

8.8.3.

Whenever possible, a notice period of one month should be given prior to the speaker's visit to school, with the presentation content of the talk being provided in advance.

8.8.4.

Staff will be present at any presentation to ensure that a talk/workshop is aligned with the religious ethos of the school, to British values and takes the 'Prevent Duty' into account.

8.8.5

A log of visiting speakers is kept on the school intranet.

8.9. Missing pupils

8.9.1.

A pupil going missing from education is a potential indicator of abuse or neglect. If you are concerned that a pupil has been out of school *with no satisfactory reason or communication from home*, you must inform the DSL who will inform the local authority.

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

8.9.2.

Any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more, is deemed to be at risk.

9.

Safeguarding & CHILD PROTECTION TRAINING

9.1. Training for the DSL and DDSL (See Appendix C for a list of DSL training)

See Part 4 of this Policy

9.2. Training for all Staff

9.2.1.

OSCB Generalist Safeguarding Children in Education is undertaken by all Staff every three years. The most recent training was provided by the Local Authority Designated Officer (LADO), Alison Beasley. This included training on sexual violence & sexual harassment between children.

9.2.2.

All Staff are asked to read KCSIE Part 1 & KCSIE Annex A 'Further Information' (Sept 2018)

Each September, Staff are required to read:

- This Safeguarding (Child Protection) policy
- Staff code of conduct & behaviour policy
- Acceptable use of I.T. and E-Safety (in the Health & Safety policy)
- Whistleblowing policy
- Pupil Behaviour policy

and sign a declaration to say that they have done so (See appendix G).

The Staff Handbook is also distributed and access provided to all other school policies.

9.2.3

New Staff are given induction training on arrival by the DSL and are required to complete the reading outlined above.

9.2.4.

A record is kept of Staff attending Safeguarding training by the DSL.

9.4. Other related training

9.4.1.

The Head / DSL (and others in the Senior Management Team) will undertake training in Safeguarding (Child Protection), Safer Recruitment and Interagency work.

9.4.2.

The Board of Trustees have an annual update in Safeguarding (Child Protection) from the DSL and other training from external agencies when required.

9.5. Induction training for older pupils with responsibilities

9.5.1.

Older pupils, when they have defined areas of responsibility, are given simple basic training in Safeguarding (Child Protection) for instance, to report concerns, to listen and to recognise aspects of pupil behaviour which might cause such concern).

10. Boarding (Specific)

10.1.

General points (See Appendix F and the Boarding Policy for more details)

10.1.1.

This whole school Safeguarding (Child Protection) policy applies to the school's provision for boarding.

10.1.2.

This Safeguarding (Child Protection) policy also provides evidence of compliance with the *National Minimum Standards for Boarding Schools* (2015) including:

- I. Standard 2: Boarders' Induction and Support.
- II. Standard 11: Child Protection.
- III. Standard 14: Staff Recruitment and Checks on Other Adults

10.1.3

All adults living in school houses must read and sign the *Adults Living in Staff Accommodation Policy*.

10.2

Sauveterre

Sauveterre is in unique position - with its own policies - and the Cothill Trust has made specific arrangements to ensure that pupils are safe, secure and happy when staying there.

Any disclosures made in France to the DSL there (Richard Bower), would automatically be referred to the DSL and Head of the child's own school. Sauveterre is required to adhere to the locally agreed procedures of the French authorities, but the policy is also for the school to mirror the ISSRs and NMS requirements wherever possible.

Cothill boys are able to contact the Cothill House DSL from Sauveterre and his contact details (together with those of the School Listener, etc) are displayed by telephones and computers. Boys have the option to Skype if they so desire.

An ISI inspector - acting in the capacity of consultant - is visiting Sauveterre each term to offer advice and support on Safeguarding and other issues. In 2018, the Cothill DDSL has visited Sauveterre each term, when Cothill boys have been in France.

Appendix A

Cross-referenced linked policies/documentation

Policies/documentation available on the school's website:

1. Countering Bullying Policy (including Cyber Bullying)
2. Discipline, Behaviour, Rewards, Punishments & Exclusions Policy
3. Trust Complaints Policy
4. Curriculum Policy
5. E-Safety Policy
6. EAL policy
7. Fire Safety Policy
8. First Aid, Health & Hygiene Policy (including medical)
9. Trust Health and Safety Policy (general Intent)
10. Health and Safety Policy (around the School)
11. PSHE Policy
12. Risk Assessment Policy
13. Trust Safer Recruitment Policy
14. Traditional Values Policy
15. SEND Policy
16. Equality & Diversity Policy

Policies/documentation available on request from the school:

1. Accessibility Plan
2. Minibus, Travel & Trips Policy
3. Trust Equal Opportunities Policy
4. Induction Process for New Staff
6. Photographing, Using & Storing Images of Pupils Policy
7. Trust Whistleblowing Policy

Appendix B

Additional and useful web links

Working Together to Safeguard Children (2018)

(Local authorities have overarching responsibility for safeguarding and promoting the welfare of all children and young people in their area. They have a number of statutory functions and this guidance sets these out in detail)

Keeping Children Safe in Education (September 2018)

(Key statutory guidance for all schools, colleges and academies in England. It sets out what schools and colleges must do to safeguard and promote the welfare of children and young people under the age of 18)

Child Sexual Exploitation (February 2017)

(Definition and a guide for practitioners, local leaders and decision makers working to protect children from sexual exploitation)

NSPCC

<https://www.nspcc.org.uk>

Department for Education (2015) Boarding Schools: National Minimum Standards Regulations.

<https://www.gov.uk/government/publications/boarding-schools-national-minimum-standards>

The Education (Independent School Standards) (England) Regulations 2014

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/389467/Revised_independent_school_standards.pdf

Multi-Agency Practice Guidelines: Female Genital Mutilation

<https://www.gov.uk/government/publications/female-genital-mutilation-guidelines>

Prevent Duty Guidance: for England and Wales (July 2015)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf

The Prevent Duty: Departmental advice for schools & childminders (June 2015)

See above.

The use of social media for online radicalisation

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/440450/How_social_media_is_used_to_encourage_travel_to_Syria_and_Iraq.pdf

Minibus guidance

<https://www.gov.uk/government/publications/driving-school-minibuses-advice-for-schools-and-local-authorities>

Teacher Regulation Authority (TRA) - Guidance on teacher misconduct referrals

<https://www.gov.uk/government/collections/teacher-misconduct>
<https://www.gov.uk/government/publications/teacher-misconduct-disciplinary-procedures>

Adventure Activities Licensing Authority

<http://www.hse.gov.uk/aala/>

Safer internet strategies

<https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis>

Appendix C

STAFF INSET TRAINING

Channel – Prevent Training Online

2015: DMB, MB, AMEW, REMW

2016: KMA, RWA, AKA, FPA, VJB, L.Bowden, AJRC, LC, NCB, HCVC, R.Davies, R.Evans, H.Edwards, I.Garvie, S.Gower, RFG, E.Harris, SJH, PBEH, TSH, RCH, DGH, SFEH, SAJ, REJ, KML, EMP, K.Meyrick, S.Murdoch, P.Owen, J.Pridmore, AWP, MER, R.Sutton, EMS, RAS, SJT, S.Wing, S.Willis, MCW, J.Woodcock

2017: DGH

2018: EMP

OSCB Generalist Safeguarding Children in Education

All employees Jan 2017 *renewed every 3 years*

A list of attendees for this is kept by Sophie Willis, in the School office.

DSL Safeguarding Training

Richard Sutton Sept 2017

Maria Bailey October 2017 *renewed every 2 years*

Safer Recruitment

Duncan Bailey Feb 2015

Richard Sutton Nov 2018

Karen Sutton Nov 2018

Kelly-Marie Andrews Dec 2018

LSCB advice is that all staff not only receive regular training, but also online Prevent training & other informal updates.

Health and Safety Training in last three years:

CET Fire Officer (Level 3 Fire Risk Management)

Chris Gilham Dec 2014

School Fire Officer

Duncan Bailey

Staff Fire Training

All Staff January 2018

Fire Marshall Course (valid for 3 years)

Jacqueline Pridmore Feb 2018

Kyle Langman July 2018

Robert Williams July 2018

Duncan Bailey September 2018

Swimming & Staff First Aid Training:

Fiona Asher
John Carver
Nicholas Compton-Burnett
Chala Dodds
James Foster
Ed Hawkins
Peter Hill
Alex Kidd

Jan 2018

Kelly-Marie Andrews
Ralf Arneil
Adam Asher
Duncan Bailey
Maria Bailey
Hattie Crump
Rory Griffiths
Robin Howard
Stephen Johnson
Richard Jones
Kyle Langman
Elizabeth Sutton
Richard Sutton
Robbie Williams

Jan 2017

Paediatric First Aid (*renewed annually*)

School Nurse & Senior Matrons

April 2018

CPR/Basic Life Support

Nikki Benton
Karen Capon
Karen Dalton
Hannah Fairlie
Amy Hornblow
Elaine Harris
Aidan Quick
Jacqueline Pridmore
Rosemary Sutton
Julie Walker
Samantha Wing

April 2018

Food Hygiene & Handling (*renewed every 3 years*)

Kitchen staff

Sept 2016

Appendix D: Specific issues facing people with disabilities (SEN)

I

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
- communication barriers and difficulties in overcoming these barriers.

II

Dangers include:

- Increased likelihood of social isolation.
- Impaired capacity to resist or avoid abuse or understand that a situation is abusive.
- Lack of access to a trusted person if wanting to disclose.
- Being more easily coerced or eager to please.
- Accepting - and not challenging - what some perceive to be 'cultural norms'.

III

A victim-centred approach

Whatever someone's circumstances, they have rights that should always be respected. Teachers should listen to the victim and respect their wishes whenever possible.

KCSIE 2018 advises that, evidence shows children with SEN are at greater risk of peer on peer sexual violence and harassment. In addition there are heightened risks that SEN children face online, for example, from online bullying, grooming and radicalization.

Appendix E: Boarding

A. Guardians & Lodgings

While Cothill is a boarding school, there are weekends ('Exeats') and Half Terms during each term, when children go home to be with their families. However, when a child lives abroad, it may be that he is unable to return home to his parents, in which case the school undertakes to assist with the arrangement of suitable accommodation. This is managed by the school secretary.

- Cothill insists that all children attending Cothill - but who live abroad - have a UK based guardian. All guardians are chosen by a child's parents.
- Children will occasionally spend a weekend or a day with another child's family. Any such arrangements are made by the school secretary, and will only proceed:

- a) once the host family have confirmed the invitation,
- b) the child's parents have agreed to their child spending time with the host family and contact details have been made available.

B. Arrangements for alternative accommodation should a member of Staff be suspended pending an investigation

I.

Where a member of boarding Staff is suspended pending an investigation of a child protection nature, immediate arrangements for alternative accommodation away from children will be made for the member of Staff.

C. Pupil relationships and increased potential for peer abuse.

I.

All Staff, and particularly those involved in the pastoral care of our boarders, are highly conscious of pupil relationships, and in particular the increased potential for peer abuse in the boarding community.

See Countering Bullying Policy, Discipline, Behaviour, etc Policy & Boarding Policy.

Appendix F: Minutes of Annual Safeguarding Review Meeting

Meeting held 27.6.18

E.Newton (Trust Principal 2017/18), D.Bailey (Headmaster), R.Sutton (DSL & Pastoral Deputy), Maria Bailey (Deputy DSL), T.Hodgetts (Second Master)

1.

Pastoral Report Forms

- The new Pastoral Report Forms (on the school intranet) were demonstrated by RAS. This enables all Staff to record all incidents quickly and easily. Each new incident is automatically flagged up in both RAS's and DMB's inbox. RAS noted that there had been no Safeguarding incidents in the last twelve months.
- RAS went on to explain that a parallel system will be set up over the course of the summer to record incidents of bullying. This is to ensure regulatory compliance and will bring clarity to the reporting of incidents around the school and ensure a comprehensive log of all incidents. Again, RAS, DMB and MB will be alerted in their inbox to any Bullying reports being made by Staff.

Action:

- *RAS will see AJRC to ensure that alerts are copied to MB (the Deputy DSL).*
- *DMB will seek to create a similar system - for his eyes only - for the recording of any complaints. He noted that there have been no official complaints made this academic year.*

2.

Safeguarding Document

- TSH & RAS - with exceedingly helpful input from Lieze Nice - have updated the Safeguarding Policy - with reference to new regulations in KSCiE 2018 - which will go live in September. The final page (Appendix H) is the usual sign off page for all Staff, but now has additional requirements in line with compliance regulations. Staff must now read:

The Safeguarding Policy

KSCiE 2018 (Part 1)

The Code of Professional Conduct Policy

The Behaviour Policy

The Whistleblowing Policy

The ICT Acceptable Use Policy

It was noted that Professional Development Reviews include space for Staff to record any Safeguarding concerns they may have.

Safer Recruitment Training.

- DMB needs to complete this again. MB (Deputy DSL) will also complete this and EN recommended that NCB & RAS complete this training since someone qualified in Safer Recruitment now needs to be present during each part of an interview process.

Action:

TSH to speak to NCB, Also to speak to KMA, who was thought to have also undertaken this training, given that she employs peripatetic music staff.

Fire

- DMB is the school Fire Officer. TSH considered that better coordination was required with regard to our fire procedures, with DMB, MER and TSH all having a role to play.
- REMW & Jacqui have completed Fire Training, KML & DMB booked in for training.

Action:

Sophie to send TSH names & dates of Staff who have recently completed Fire & First Aid training.

Updates

- TSH outlined some of the updates to the Safeguarding document. This includes guidance on sexual harassment, sexual violence & peer to peer abuse - in Appendix D of the school policy.

Induction

RAS completes all Staff induction, and will follow the guidance in Paragraph 9 of the new Safeguarding Policy.

3. INSET

- RAS has booked in Andrew Lewin from the BSA to deliver INSET on boarding for Staff on September 3rd. DMB felt that all those in staff accommodation (and therefore undertaking boarding duties) should attend, plus RAS & MER.

4. AOB

- DMB thanked RAS for taking the lead as DSL, and TSH for his work constructing the policy
- Thanks were recorded for the excellent assistance provided by Lieze Nice, Trust Compliance Officer.
- It was suggested that TSH (and RAS) might benefit from a visit to Mowden in September, to speak with Kate Martin, the deputy at Mowden who completed a lot of excellent work for their recent inspection. Agreed.
- Ralph Townsend will receive a copy of these minutes together with the new safeguarding Policy asap.

Action:

TSH to forward minutes to Ralph Townsend & might get in touch with Mowden

SAFEGUARDING

Everyone at Cothill House:

Has the right to be treated fairly

Has the right to speak freely about their values & beliefs

Is encouraged to respect and support each other

Has the right to be supported in all their needs

***Everyone* has the right to be happy,
healthy & safe**



Our Designated Safeguarding Lead (DSL) is Mr Sutton
Talk to him if you have any worries or concerns.



The Deputy Safeguarding Lead is Mrs Bailey.

but *all* the Staff are here to help.

If you feel you need to talk to someone off site, there are three useful phone numbers you can call. These numbers are also by the phones:

Our independent listener is <i>Kate Carling</i>	01865 391271
Childline	0800 1111
Help at Hand <i>The Children's Commissioner</i>	0800 528 0731