



# SWANBOURNE HOUSE



## CHILD PROTECTION (SAFEGUARDING) POLICY

**Applies to:** Whole School including EYFS and Boarding

**NMS for Boarding:** 8.1, 8.2, 8.3, 8.4, 11.3, 11.4, 11.5, 11.61, 17.3, 19.1, 19.2, 20.1, 20.6, 20.10, 22.1, 23.4, 23.5

**Contributors:** Deputy Designated Safeguarding Lead and Headteacher

**Owner:** Designated Safeguarding Lead

**Approved by:** Governing Body

**Date approved:** September 2024 (to be formally ratified by Governing Body September 2024)

**Next review:** August 2025

To be read in conjunction with:

- Rewards and Sanctions Policy
- Anti Bullying Policy
- Attendance Procedure
- Online Safety
- Safer Recruitment
- Information for Staff Document – including Staff Code of Conduct and Whistleblowing
- Keeping Children Safe in Education, Part 1, Part 5 and Annex B (September 2024)

## STATEMENT OF INTENT

The safety and welfare of all our pupils at Swanbourne House School is the highest priority for all staff and governors. Our priority is to know every pupil as an individual and to provide a secure and caring environment so that every child can learn safely and securely. In all matters relating to Child Protection and Safeguarding, the school will follow the procedures laid down by the Buckinghamshire Safeguarding Children Partnership together with DfE Statutory guidance contained in Keeping Children Safe in Education (September 2024), Working Together to Safeguard Children (July 2023), What to do if you're worried a child is being abused (March 2015), the Disqualification Under the Childcare Act 2006, Revised Prevent Duty Guidance: for England and Wales (December 2023), The use of social media for on-line radicalisation (July 2015), 'Mental Health and Behaviour in Schools (March 2015) and the National Minimum Standards for Boarding (September 2022)

This policy is applicable to the whole school community, including those pupils in the Early Years Foundation Stage (EYFS) and Boarding. The policy will be reviewed by governors annually or more frequently as needs determine or in light of changing statutory guidance. All members of staff (both teaching and support staff) have a duty to protect and safeguard our pupils' welfare and must, therefore, familiarise themselves and comply at all times with this policy. Reference is also made to the Information for Staff Document – including Staff Code of Conduct and Whistleblowing, Safer Recruitment Procedures, IT: E-Safety, Anti-Bullying and Behaviour Policy. The school provides additional guidance to staff with regard to child on child abuse including the inappropriate use of electronic media. All school staff should be aware that safeguarding incidents can happen at any time and anywhere and that they are required to be alert to any possible concerns. Where a child is thought to be suffering significant harm or is likely to do so, a member of staff must take action immediately to report the incident to the Designated Safeguarding Lead – Katie Markey. The school is also committed to promoting pupil wellbeing where needs are identified but do not meet the criteria for referral in the context of significant harm.

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# CONTACT INFORMATION

## **Designated Safeguarding Lead (DSL)**

Mrs Katie Markey – Deputy Head Teacher responsible for Pastoral Care [SLT]  
[kmarkey@swanbourne.org](mailto:kmarkey@swanbourne.org) – 07732 600379 / 01296 722825.

In the absence of a DSL, child protection matters are referred to:

## **Deputy Designated Safeguarding Lead (DDSL)**

Mrs Ruth Nicoll – Head of Lower School  
[rnicoll@swanbourne.org](mailto:rnicoll@swanbourne.org) - 01296 720264

or

## **Deputy Designated Safeguarding Lead (DDSL)**

Mrs Justine Mitchener – SENDCo  
[jmitchener@swanbourne.org](mailto:jmitchener@swanbourne.org) - 01296 720264

or

## **Deputy Designated Safeguarding Lead (DDSL)**

Mr Jamie Henderson – Boarding parent  
[Jhenderson@swanbourne.org](mailto:Jhenderson@swanbourne.org) 01296 722 816

## **Safeguarding Governor:**

Mr Peter Ackroyd Stowe Group Governing Body.  
[packroyd@stowe.co.uk](mailto:packroyd@stowe.co.uk)

## **Chair of Governors:**

Simon Creedy-Smith

## **The Stowe Group Safeguarding Lead:**

Ms Rebecca Brown

## **Prevent and Mental Health Lead:**

Mrs Katie Markey – Deputy Head Teacher responsible for Pastoral Care [SLT]  
[kmarkey@swanbourne.org](mailto:kmarkey@swanbourne.org) – 07732 600379 / 01296 722825.

## **Designated Teacher for Looked After Children:**

Mrs Justine Mitchener – SENDCo  
[jmitchener@swanbourne.org](mailto:jmitchener@swanbourne.org) - 01296 720264

NB. Some referrals at Swanbourne may fall into Milton Keynes Council catchment, depending on the child's home address.

## **Bucks Safeguarding in Education:**

Educational Safeguard Advisory Service (ESAS) **01296 387981**  
[secure-esasduty@buckinghamshire.gov.uk](mailto:secure-esasduty@buckinghamshire.gov.uk)

Buckinghamshire Family Information Service (Levels 1&2) **01296 383065**

First Response (office hours) (Levels 3&4) **08454600001/ 01296 383962**

First Response (emergency hours) **0800 9997677**

[Secure-cypfirstresponse@buckinghamshire.gov.uk](mailto:Secure-cypfirstresponse@buckinghamshire.gov.uk)

Safeguarding Officer – Bucks DESIGNATED OFFICER (DO) **01296 382070**

[secure-lado@buckinghamshire.gov.uk](mailto:secure-lado@buckinghamshire.gov.uk)

Milton Keynes DESIGNATED OFFICER (DO) **01908 253169/253170**  
Central Beds DESIGNATED OFFICER (DO) **0300 300 4833**  
Northampton MASH **0300 126 1000**  
Oxfordshire Schools DESIGNATED OFFICER (DO) **01865 815956**

**Other useful contacts include:**

Bucks Family Information Services **01296 383293**  
Non-emergency police number **101**  
Bucks Family Information Service **01296 383065**  
DfE telephone helpline (for non-emergency advice) **020 7340 7264**  
NSPCC **0800 800 5000**  
Childline **0800 11 11**  
Kidscape – Parent Advice Line (bullying) (Mon-Weds from 9:30am to 2:30pm) **020 7823 5430**  
Female Genital Mutilation Helpline (NSPCC) **0800 028 3550** [fgmhelp@nspcc.org.uk](mailto:fgmhelp@nspcc.org.uk)  
Samaritans - Helpline **116 123**  
Forced Marriages Unit **020 7008 0151** [fm@fco.gov.uk](mailto:fm@fco.gov.uk)  
Crimestoppers **0800 555 111**  
R-U Safe? Barnardos **01494 785 552**

## DEFINITION

Safeguarding and promoting the welfare of children is defined as: [Working Together to Safeguarding Children DfE 2023]

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

Safeguarding refers to measures implemented to protect the health, wellbeing and human rights of individuals, which allow people — especially children, young people and vulnerable adults — to live free from abuse, harm and neglect.

Child protection is part of safeguarding and promoting the welfare of children and is defined for the purpose of this guidance as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.' [Working Together December 2023].

Definitions:

- Child(ren): All children on the roll at Swanbourne House, including EYFS.
- Staff: All staff at Swanbourne House including Full-time, Part-time, Temporary, Volunteers, Junior staff, GAP students and Governors.

# POLICY REVIEW PROCEDURE

Policy and procedures are adjusted on an ongoing basis by the DSL on receipt of guidance from DfE, ISI, IAPS and local children's social care authorities and are in accordance with locally agreed interagency procedure. In addition, the policy is reviewed annually by members of the Swanbourne House Safeguarding Committee (Head, DSL, Deputy Head, and Designated Governor) and by the Stowe Group Board of Governors. If there were to be a substantiated allegation against a member of staff, the school would work with the Local Authority Designated Officer (DO) to determine whether any improvements to the school's procedures or practice need to be made.

Swanbourne House Safeguarding Policy is available:

- On the Swanbourne House school website
- School Office
- DSL's office
- Deputy Head's Office
- SharePoint

## WHAT IS CHILD ABUSE

All members of staff are directed to the advice "What to do if you are worried a child is being abused – Advice for practitioners" (March 2015) <https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--> which provides information on understanding and identifying abuse and neglect. In addition a summary of two NSPCC fact sheets around the definitions of abuse and recognising signs of abuse at different stages of a child is attached at Appendix A and should be referred to by all staff in raising their awareness of and helping them to identify the signs of child abuse. All members of staff must also be familiar with Part 1 and Annex B of KCSIE (September 2024).

Part 1 of the DfE guidance KCSIE (September 2024) states that all staff must be aware of the categories of abuse and neglect and the actions to be followed to protect a child from harm whether this is actual or likely. The categories of abuse and harm are rarely 'standalone' events that can be covered by one definition or label. In most cases multiple issues will overlap with one another. Members of staff should also be aware that abuse can be committed by anyone including other children (for example by one or more pupils against another – child on child abuse). The guidance also highlights that sexual abuse is not only perpetrated by adult males but may also be committed by women and by other children. In the new guidance, Part 1 also highlights that all staff should be aware of the school systems in response to children who are absent from education, particularly on repeat occasions and/or prolonged periods.

KCSIE (September 2024) also reminds staff of the importance of mental health in relation to safeguarding and the welfare of children and reminds them that safeguarding incidents can be associated with factors outside of school and there can be risk of abuse or exploitation in situations

outside of their families, for example sexual or criminal exploitation or serious youth violence.

All staff are made aware that abuse, neglect and safeguarding issues are rarely standalone events than can be covered by one definition or label. In most cases multiple issues will overlap with one another. We recognise that abuse can take place wholly online, and that technology may be used to facilitate offline abuse.

- **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. They may be abused by an adult or adults or another child or children. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.”
- **Physical Abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- **Emotional Abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child’s developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- **Sexual Abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
- **Neglect:** the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure

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

- **Domestic Abuse:** can [be] psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and/ or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

## THE PREVENT DUTY

- All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”.
- This duty is known as the Prevent duty.
- The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations
- There are four general themes: risk assessment, working in partnership, staff training, and IT policies
- Prevent is about safeguarding – it is part of the daily part of what teachers do – you know the families / children you work with.
- It is part of the safeguarding we do every day
- It is looking at students who find themselves in situations they find they cannot get themselves out of, and it about trying to keep them out of the criminal space
- Looking at individuals and the challenges they face and making sure we can signpost them to the people that can help them.

## THE DSL & TRAINING

The DSLs and DDSLs are trained every two years in safeguarding and inter-agency working. Training is provided by the local social services department and approved external welfare agencies. This includes training on the part of the DSL in regard to the school's Prevent duty with reference to pupil radicalisation. DSLs within the Stowe Group meet termly in person and half termly via zoom at which there are always presentations, training and updates.

All staff who work with children are trained in child protection at least every three years (Educare modules) with regular updates (at least annual) in regard to new legislation. KCSiE Part One is taken as the starting point for all staff; all staff are required to read KCSiE Part One and further briefings are designed to support staff understanding of safeguarding issues. School leaders and staff who work directly with children have also read Annex B of KCSiE 2024. Updates are provided at start of term staff days in briefings led by DSL or DDSLs. More detailed training will be delivered by an outside agency or the DSL and DDSLs. The content of this training is discussed with the Safeguarding partners and will cover types of abuse and neglect, children missing from education, child sexual exploitation, female genital mutilation, prevent radicalisation, online safety, filtering and monitoring and the specific procedures of Swanbourne House school.



All staff complete Educare training module on Children Protection and Safeguarding in Education, Online Safely, Data Protection and Prevent.

The DSLs meets with all new members of staff to go through the Safeguarding policy at SHS and our logging system MyConcern.

Prior to formal training with the DSLs, all new staff, temporary staff and volunteers who work with children are issued with written Child Protection guidelines, a copy of this policy, the staff code of conduct, the identity of the Senior and Deputy Designated Safeguarding Lead and a copy of Part 1 of Keeping Children Safe in Education. A short Safeguarding video is also shared with all new members of staff. (HR organise this prior to their induction day)

Temporary and voluntary staff are made aware of the school's procedures.

**Pupils** - all Year 8 pupils receive basic Safeguarding awareness training from the DSLs; all pupils are made aware of safeguarding issues through Personal Tutor sessions and through PSHE and online safety education. The DSL reminds them during assembly of who they can talk to and what to look out for (green lanyards and posters and the Safeguarding are of pupil sharepoint)

## SAFER RECRUITMENT

Swanbourne House School follows the Government's recommendations for the safer recruitment and employment of staff who work with children and the ISI guidance in Part 4 of the regulations concerning the suitability of staff, supply staff and proprietors. All members of the teaching and support staff at the school, including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches, are checked with the Disclosure and Barring Service before employment. In addition those Governors, Volunteer Helpers and adult members of the families of members of staff who live on site and have contact with children are also checked with the DBS.

The Governing Body and SLT take a proportionate risk-based approach to the level of information that is provided to temporary staff, volunteers and contractors. The DSL will share information about pupils on a need to know basis.

This policy works in conjunction with the Swanbourne House Safer Recruitment Policy B12.

The recruitment administrator obtains assurance that appropriate child protection checks and procedures including training apply to all staff employed by outside organisations using school facilities e.g. Sports camps, and any supply staff used by the school.

Standard application forms are required of all applicants for positions in the school and CVs are not accepted. References are taken up using a standard reference form prior to interview whenever possible and job descriptions and person specifications are provided to referees. Identity checks, qualifications, right to work in the UK and the completion of a medical questionnaire are carried out at the time of the interview where possible. Safeguarding questions are included at every interview and the school ensures at least one person

on every interview panel has been trained in safer recruitment. As of September 2023, those staff trained are Katie Markey, Ruth Nicoll, Justine Mitchener, Matt Phillips and Karen Hart. References and career history are scrutinised as part of the recruitment process for potential staff. In line with the KCSiE online 'screening checks' will be made for any applicants to assess their suitability to work with young children.

When responding to a request by potential employers for current or past staff who may be/have been under suspicion of being unsuitable to work with children, they are advised to contact the Disclosure and Barring Service (DBS) and NCTL. The school fulfils its legal duty to respond to requests from the DBS for any information it has on record for new referrals after 20th Jan 2009 or existing referrals at 20th Jan 2009 where barring was not automatic.

## THE DESIGNATED SAFEGUARDING LEAD

The Deputy Head is DSL for the whole school including EYFS. She has been fully trained for the demands of this role in child protection and inter-agency working. She is also the Deputy Head, Pastoral and is a member of the senior management team at our school, and is also our Prevent Lead. In her absence Ruth Nicoll, Justine Mitchener, Lucinda Geliot and James Henderson are designated as the Deputy Designated Safeguarding Lead (DDSL),. Both the DSL and her deputies regularly attend courses with child support agencies to ensure that they remain conversant with best practice. They undergo refresher training regularly and at least every two years. The DSL and her Deputies also ensure their knowledge and skills remain up to date through the receipt and reading of relevant e-bulletins and emails, and they read and digest safeguarding developments also through meeting with other DSLs. Their training meets the requirements of KCSiE September 2024.

The DSL is clear that although she may delegate activities to the DDSLs and/or other named staff above she retains the ultimate lead responsibility for child protection and safeguarding at the school at all times.

The DSL maintains close links with Buckinghamshire Children's Services, Milton Keynes Children's Services and the LADO, contributes to the operation of the Safeguarding Children Partnership and reports regularly each term to the Governors on the Safeguarding issues outlined above, at the termly full Governors' Meeting where Child Protection and Safeguarding is a standing item on the agenda and in her written report to Governors. She maintains close liaison with the DSLs at Stowe and Winchester House and informs them of any referral or potential referral on a 'no names' basis.

## CONCERNS ABOUT A CHILD

Safeguarding is everyone's responsibility. Once a concern has been raised by a member of staff concerning a child, it is the responsibility of the DSLs or DDSLs to make a decision about referring the matter to the Local Safeguarding Children Board. Any member of staff may make a direct referral to external agencies and the contact details of the DESIGNATED OFFICER (DO) are therefore included in this policy; staff who make their own referral should inform DSL that they have done so. Parental consent is not required to make a referral to statutory agencies. If at any time there is a risk of immediate, serious harm to a child a referral will be made to

Children's Social Care immediately. If a crime may have been committed, the matter will be reported to the Police.

Staff who are speaking to a child who has raised an issue of safeguarding concern about themselves or another pupil should never promise that they will not tell anyone about an allegation. It will not be appropriate to promise unconditional confidentiality as information will need to be shared with relevant staff in school and perhaps with children's social care. Staff are reminded that children are not always ready or able to talk about their experiences of abuse and/or may not always recognise that they are being abused.

Staff will report concerns to the DSL or to a DDSL, using MyConcern. During term time the DSL (or a deputy) will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. In exceptional circumstances this discussion could be by phone or email, but face to face discussion is preferred, followed by logging onto MyConcern. Contact details are made available to staff including the Safeguarding Mobile Phone Number: 07732 600379 In the DSL's absence from school the DDSLs should be aware and make themselves available for staff to raise any safeguarding concerns.

It may be that advice is sought from the DESIGNATED OFFICER (DO) concerning borderline cases. It will always be the case that the school will seek to ensure that children receive the right help at the right time, to address risks and prevent issues escalating, to act on early signs of abuse and neglect, to keep clear records, to listen to the views of the child, to reassess concerns when situations do not improve and to share information quickly.

The School recognises that there is a difference between safeguarding children who have suffered or are likely to suffer significant harm and those who are in need of additional support from one or more agencies; this includes children with SEND. The former will be reported via the DESIGNATED OFFICER (DO) to Children's Social Care agencies or the police immediately, whereas the latter will lead to inter-agency assessment such as the "Common Assessment Framework" and "Team around the Child" approaches.

With reference to the guidelines for dealing with allegations of abuse made against a person who works with children the DSL should report to the DESIGNATED OFFICER (DO) [p.2 – Local Safeguarding Board Referral Contacts] within 1 working day. Reporting criteria are met if any person who works with children, in connection with his/her employment or voluntary activity, has:

Behaved in a way that has harmed a child, or may have harmed a child;

Possibly committed a criminal offence against or related to a child;

Behaved towards a child or children in a way that indicates s/he is unsuitable to work with children.

The DESIGNATED OFFICER (DO) will advise the DSL when/if the parents or carers should be informed, and if the police are to be informed.

## RECEIVING A DISCLOSURE

All pupils at Swanbourne House School are made aware of the opportunities they have to express their concerns through speaking to members of staff, reporting on the safeguarding area on sharepoint, contacting the School Counsellor, Independent person or Independent Helplines. Telephones around the school list the Childline contact number. Any member of staff may become aware of a child in distress or suspicious that a

child may have been maltreated. The abuse or suspected abuse may have taken place at home, school or elsewhere. It may involve parents, relations, staff, other adults or pupils. The welfare of the child at risk is the first priority.

If any member of staff is approached by a child who wishes to tell them a worry of this kind, they should:

- Take the concerns seriously and listen sympathetically;
- Do not offer confidentiality and explain that you may have to inform someone else;
- Do not ask leading questions;
- Do not make promises
- Write the report of the meeting, adding signature and the date;
- Immediately report to DSL or in her absence one of the DDSs, and log it onto MyConcern. Staff are reminded that children are not always ready or able to talk about their experiences of abuse and/or may not always recognise that they are being abused.

## RECORD KEEPING

The school's Child Protection (Safeguarding) records are kept securely in the DSL's office, and are separated from other routine pupil records. Access is restricted to the DSL and the DDSs. The DSL ensures that the system for sharing information across the school and different areas and functions is coordinated to maintain a holistic view of individual pupil needs. The DSL is responsible for ensuring that any concerns, discussions, decisions and reasons for Child Protection and Safeguarding decisions are recorded in writing and kept securely as outlined above. The vast majority of safeguarding records are now logged on MyConcerns and are transferred securely when the child moves onto their next school.

## EARLY INTERVENTION

The school supports and will contribute towards multi-agency working in order to safeguard our pupils in line with "Working Together to Safeguard Children" 2023 and Section 17 Children Act 1989. The designated safeguarding lead and any deputies will liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children.

Providing early help is important in responding to needs at the earliest possible stage which reduces the chance that problems escalate. All staff members must be prepared to identify children who may benefit from early help.

Any child may benefit from early help, but all school staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- has a mental health need
- is a young carer;

- is frequently missing/goes missing from care or home;
- is misusing drugs or alcohol;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult
- mental health problems or domestic abuse; and/or
- has returned home to their family from care

Early help means providing support as soon as a problem emerges at any point in a child's life. In the first instance staff should always discuss early help requirements with the DSL. In the first instance staff should discuss the need for early intervention with the DSL. Early Intervention may involve support from the class teacher or personal tutor or from another member of the staff who is able to offer suitable pastoral counselling; judgment as to the member of staff with whom a particular child is likely to be most open will be exercised. It may be necessary to involve external counselling support for a child – this may be our Independent Listener (Sophie Rickner) or a representative of an external agency.

If the DSL deems that early help is appropriate he should then support staff in liaising with other agencies and setting up an multi-agency assessment as appropriate. Staff may be required to support other agencies and practitioners in an early help assessment, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse. If parents and/or the child do not consent to an early help assessment, the DSL should take advice from the Buckinghamshire or Milton Keynes Safeguarding Children Partnership bearing in mind that decisions will always be taken in the child's best interest. The case should then be kept under constant review and consideration should be given to referring a case to children's social care if the child's situation does not appear to be improving. Where any child is in need of additional support from one or more agencies, we expect that a comprehensive assessment will be undertaken in line with the provisions of this document. This would use local processes which the school will adhere to, including the use of the "Common Assessment Framework (CAF)" and "Team around the Child (TAC)". This includes providing an early offer of coordinated help when additional needs of children are identified and contributing to multi-agency plans to provide additional support to children subject to child protection plans. However, decisions to seek support for a child in need will always be taken in consultation with parents and pupils. Where a child is suffering or likely to suffer significant harm, contacts with parents will be determined by the local authority in line with their investigation plan. Normally, parents will be kept informed of the need to investigate unless this places the child at further risk of harm.

Staff should be aware of the issues in regard to mental health which may show themselves in anxiety, eating disorders, concerns over body image and self-harm which may be particularly prevalent amongst full and weekly boarders.

Staff should be particularly alert to pupils' relationships with each other and the potential for peer abuse within the Boarding House as well as across the rest of the school. Staff should also note that children with SEN and disabilities are more likely to be abused or neglected and should be especially alert to the well-being of pupils on the SEND list and ensure that there is early intervention to give support if there are any concerns.

Staff are to report any Safeguarding concerns about a child to the DSL or DDSL immediately, and before the end of the working day. The DSL will be in a position to make a judgement on whether the matter needs to be referred to external agencies, and indeed whether the child is safe to go home.

## ALTERNATIVE PROVISION

When a child is accessing an alternative provision, the school remains responsible for the safeguarding of that child. It will ensure that the provision has secure and robust safeguarding arrangements in place and meets the needs of the child. A member of staff, from school, will regularly visit the provision and meet with the child to hear their voice and ensure regular attendance.

## DIGITAL SAFEGUARDING RISKS/ FILTERING & MONITORING

The school recognises that the use of technology has become a significant component of many safeguarding issues including child sexual exploitation, radicalisation and sexual predation. There are three broad areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful material
- **contact:** being subjected to harmful online interaction with other users
- **conduct:** personal online behaviour that increases the likelihood of or causes harm

The school seeks to ensure that there are appropriate internet filters and monitoring of internet use in place. The staff receive CPD on filtering and monitoring by the Head of ICT, with the support of the DSL. The DSL and DDSL received CPD on Senso. Similarly, there is a clear policy on using mobile technology in school, such as that day pupils do not bring their own devices into school, and boarders have restricted use at specified times. The pupils are taught as part of the Computing and PSHE schemes of learning about the risks of online technology and how to keep themselves safe online. In addition, we may provide a programme of external speakers (from organisations such as Childnet, NSPCC and CEOP) to speak to the children. Staff are regularly briefed about online safety and issues to be aware of regarding pupil behaviour online. All staff complete an Educare module on Online Safety every three years.

The one-to-one devices introduced each new academic year to existing or new pupils to Year 7 will have several Safeguarding software deployed to them. This ensures all children are safe online; the software is Senso and is used across The Stowe Group. When the pupils are in lessons and prep sessions, monitoring is done through Classroom Cloud. At the beginning of this academic year, the school introduced a new safeguarding application explicitly designed to enhance the safety and well-being of our pupils when they are on school-owned and personal devices outside of school. The application called SchoolsMobile will add another layer to the school's safeguarding measures, including the following:

1. **Online Content Filtering:** The application offers robust content filtering capabilities, allowing parents to control and monitor the types of content their children can access online. It protects

them from inappropriate and potentially harmful material, helping them maintain a safe online environment.

2. **Internet Usage Monitoring:** With this application, they can keep track of their child's internet usage patterns. Parents can see which websites they visit, the apps they use, and how much time they spend online. This monitoring feature empowers parents to guide their digital activities..

Filtering and monitoring are discussed with the school governor. Staff are referred to the Information for Staff Handbook regarding using personal devices and social media appropriately.

## CHILDREN MISSING FROM EDUCATION (CME)

A child going missing from education is a potential indicator of abuse or neglect. The school has a duty to inform the local authority of any pupils who:

- have been taken out of school by their parents and are being educated outside the system e.g. home education;
- have ceased to attend school and no longer live within reasonable distance of the school at which they are registered;
- have been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
- are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the school at the end of that period; or,
- have been permanently excluded.

Any pupil absent from school for five school days, where it has not been possible to make contact with parent, carer or another family member, will be reported as a Child Missing in Education (CME) using the **Buckinghamshire CME Protocol**. Any absence, without satisfactory explanation, of a pupil currently subject to a Child Protection or Child in Need plan is immediately referred to their social worker.

Parents/carers must inform school if there are any changes to a pupil's living arrangement. Swanbourne House has a mandatory duty to inform the local authority, via the First Response Team, if a child under the age of 16 years old lives with someone other than their parent, step-parent, aunt, uncle or grandparent for a period of more than 28 days. This is defined as being a private fostering arrangement.

## LOOKED AFTER CHILDREN

The school ensures that in the case of any "looked after" children being educated by the school there are sufficient measures in place. There will be a designated member of staff (Justine Mitchener -SENCO/DDSL) who has the training, skills, knowledge and understanding necessary to support and keep LAC children safe. This designated member of staff has responsibility for their welfare and progress and has up to date assessment information from the relevant local authority, the most recent care plan and contact arrangements

with parents and delegated authority to carers. The designated member of staff attends regular review meetings with the local authority and designated person from the Virtual School.

## CONTEXTUAL SAFEGUARDING

Contextual Safeguarding is an approach to understanding, and responding to, children's experiences of significant harm beyond their families. It recognises that the different relationships that children form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers may have little influence over these contexts, and children's experiences of extra-familial abuse can undermine parent/carer-children's relationships.

At Swanbourne House, we recognise that pupils may encounter safeguarding issues that happen in the wider community and we will respond to such concerns, reporting to the appropriate agencies in order to support and protect the pupil. All staff, and especially the DSLs, will consider the context of incidents that occur outside of school to establish if environmental factors may be putting the pupil's welfare and safety at risk. For example, some environments to consider may include local parks, shops, bus stops, public transport, community sports facilities etc.

Children who may be alleged perpetrators will also be supported to understand the impact of contextual issues on their safety and welfare. In such cases the individual needs and vulnerabilities of each child will be considered.

## MENTAL HEALTH

Mental Health affects all aspects of a child's development including their cognitive abilities and their emotional wellbeing. Childhood and adolescence are when mental health is developed and patterns are set for the future. For most children, the opportunities for learning and personal development during adolescence are exciting and challenging and an intrinsic part of their school experience. However, they can also give rise to anxiety and stress. Children may also suffer mental health issues owing to circumstances inside and outside school.

All Swanbourne House staff are responsible for fostering a culture which encourages pupils to openly discuss their problems, including any mental health concerns.

Where a concern about a pupil's mental health is identified, the Designated Safeguarding Lead (DSL) will assess the risks to that pupil's welfare and will consult with the pupil, his or her parents (where appropriate), the School Counselling Team, the Mental Health trained team and other members of staff and the school nurse (as necessary) to determine appropriate action to be taken to safeguard, support and monitor that pupil.

Those with day to day contact with pupils are likely to be best placed to spot any changes in behaviour which may indicate that a pupil is at risk of a mental health problem. They should report any concerns to the DSL in accordance with the terms of this policy.



### **A child might need help if they:**

- Often feel anxious or worried
- Has very frequent expressions of anger or is intensely irritable much of the time
- Has frequent stomachaches or headaches with no physical explanation
- Are in constant motion; can't sit quietly for any length of time
- Has trouble sleeping, including frequent nightmares
- Loses interest in things s/he used to enjoy
- Avoids spending time with friends
- Has trouble doing well in school, or academic grades decline
- Fears gaining weight; exercises, diets obsessively
- Has low or no energy
- Has spells of intense, inexhaustible activity
- Harms her/himself, such as cutting or burning her/his skin
- Engages in risky, destructive behaviour
- Harms self or others
- Has thoughts of suicide
- Thinks his/her mind is controlled or out of control; hears voices
- Has witnessed a domestic abuse incident
- Has witnessed or is involved in 'Honour-Based Abuse'

### **Signs and symptoms of mental or emotional concerns:**

- Anxiety and Depression
- Suicidal thoughts and feelings
- Eating Disorders
- Self-harm

## **CHILD ON CHILD ABUSE**

Any allegation of child on child abuse must be reported immediately to the DSL. The DSL will take advice from children's services on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved, including the child or children accused of abuse. We will ensure that all children understand the law on child-on-child abuse is there to protect them rather than criminalise them. Swanbourne understands that support for any siblings needs to be considered. A pupil against whom an allegation of abuse has been made may be suspended from the school during the investigation and the school's policy on behaviour, sanction and rewards will apply. Any form of child on child, no matter how small should be logged on our Child on Child log on Isams. The DSL will monitor these logs and feedback key trends with the Headteacher.

If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the school will ensure that, subject to the advice of children's services, parents are informed as soon as

possible and that the pupil is supported during the interview by an appropriate adult. In the case of a pupil whose parents are abroad, the pupil's Education Guardian will be requested to provide support to the pupil and to accommodate him/her if it is necessary to suspend the pupil during the investigation.

## **BULLYING**

Bullying is unacceptable behaviour and staff are referred to the procedures in the Anti-Bullying Policy. Child-on-child abuse, in or out of school, should not be tolerated or passed off as banter or merely part of growing up. Staff and governors are aware that Child-on-child abuse can sometimes be hidden or not reported, and therefore should be vigilant. All victims must be reassured that their concerns will be taken seriously, and they will be supported and kept safe. Equally the gendered nature of some child on child abuse is deemed unacceptable. Where there is reasonable cause to suspect that a child is suffering any form of abuse, or likely to suffer significant harm then staff follow the procedures laid out in this policy. Staff are also encouraged to keep in mind the potential for online abuse, sexting (including upskirting), sexual violence, sexual harassment, physical abuse, initiation / hazing type violence and rituals, or other forms of abuse made possible by social media, in particular staff are aware of the specific dangers posed by abuse online from their peers and online safeguarding training is delivered regularly (Educare modules).

Victims and perpetrators will be supported by showing that staff take these matters extremely seriously and will always look to address and deal with instances of child on child abuse, to ensure that victims are kept safe. All instances of bullying or physically aggressive behaviour will be logged by the DSL on our bullying log and on MyConcern.

All staff seek to educate the children to minimise the risk of child on child abuse through assemblies, our PSHE programme and Personal Tutor programme.

For more information refer to our Anti-Bullying Policy.

## **CHILD SEXUAL VIOLENCE AND CHILD SEXUAL EXPLOITATION (ALL FORMS OF ABUSE)**

Child Sexual Violence (CSV) and Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse. Staff are also aware that Sexual

violence and sexual harassment can happen outside of the school premises and online. At Swanbourne House School there is a zero-tolerance approach to sexual violence and sexual harassment; it is never acceptable and will not be tolerated. Equally, we are aware of the risks of unsubstantiated, unfounded, false or malicious reports.

Further information is available:

<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/child-sexual-exploitation/>

Evidence shows girls, children with SEND and LGBT children are at greater risk. Even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Due to Boarding at Swanbourne House, there are additional risks to consider due to the unique nature of boarding accommodation and the risks associated with children sharing overnight accommodation. All staff involved in boarding are trained in safeguarding, and the boarding parent is also a DDSL and will monitor this. The supervision of boarding is set up to mitigate this risk. Any concerns raised in boarding will be dealt with in exactly the same way as any other concern..

## COUNTY LINES

As set out in the Serious Violence Strategy (see link below), published by the Home Office, a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of 'deal line'. They are likely to exploit children and vulnerable adults to move and store the drugs and money, and they will often use coercion, intimidation, violence (including sexual violence) and weapons. Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

## LOW LEVEL CONCERNS

Swanbourne promotes a whole school approach to safeguarding and promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold (see Part Four - Section two pg 106 of KCSIE September 2024) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical.

Ongoing training and discussion encourage an open and transparent culture; enable the school to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the school..

## **WHAT IS A LOW LEVEL CONCERN**

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO (the LADO can be contacted if there is any doubt).

Examples of such behaviour could include, but are not limited to:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating children.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. It is crucial that any such concerns, including those which do not meet the harm threshold (see Part Four - Section one of KCSIE September 2024), are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of the school from potential false allegations or misunderstandings.

To ensure that low-level concerns are properly understood and acted upon, Swanbourne will:

- ensure the staff are clear about what appropriate behaviour is, and are confident in
- distinguishing expected and appropriate behaviour from inappropriate, problematic or concerning behaviour, in themselves and others
- empower staff to share any low-level safeguarding concerns
- address unprofessional behaviour and support the individual to correct it at an early stage
- handle and respond to such concerns sensitively and proportionately when they are raised, and
- help identify any weakness in the school or college's safeguarding system.

## **SHARING LOW-LEVEL CONCERNS**

Low-level concerns about a member of staff, supply staff, volunteer or contractor should be reported to the DSL or Headteacher. Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified. Swanbourne will ensure they create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. Referrals can be made to the DSL, DDSL or the Headteacher.

## **RECORDING LOW-LEVEL CONCERNS**

All low-level concerns should be recorded on our low level concerns log. The record should include details of the concern, the context in which the concern arose, and action taken and lessons learnt. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible. These records will be kept in the confidential low level log.

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it will be referred to the LADO. Consideration should also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again. Records will be retained at least until the individual leaves the school's employment.

## **RESPONDING TO LOW-LEVEL CONCERNS**

The Headteacher/DSL will respond to any reports of low-level concerns by collecting as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. The Headteacher will be the ultimate decision maker in respect of all low-level concerns, although it is recognised that he may wish to consult with the DSL and take a more collaborative decision making approach. All information will be recorded along with the rationale for the decisions and action taken.

For further information please see The Stowe Groups Low-Level Concerns Policy.

# **WHISTLEBLOWING**

The school's Whistleblowing Policy [see Information for Staff handbook] makes it clear that it is the duty of employees and volunteers to report any concerns or allegations about behaviour of colleagues or practices, which are likely to put children at risk of abuse or serious harm. The whistleblower is guaranteed confidentiality until, or if, the police are informed. Where a member of staff feels unable to raise a whistleblowing issue within school or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them including the NSPCC whistleblowing helpline (0800 028 0285). The Whistleblowing Policy is part of the induction of new staff.

## EYFS

For clarity, with specific reference to Early Years Foundation Stage, the following points apply:

- Personal mobile phones, belonging to the EYFS staff are not to be used throughout contact time with the children and are put out of sight. Smart watches are not to be worn in EYFS.
- EYFS staff are not permitted to use recording equipment on their personal mobile phones to take photos or videos of EYFS children they are to use school recording equipment for all observational records.
- The ban on the use of mobile phones in the EYFS setting extends to all visitors and parents; signs are in place to enforce this.

If any allegations against people living or working at the school are made, the School understands its duty to inform Ofsted/ISI of such allegations as soon as practicable and with 14 days at the latest.

## TRANSFER DOCUMENTS

If a pupil with a Safeguarding file leaves the school, the file should be transferred to the new school as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. If the new school uses MyConcern this will be done electronically, if not then their safeguarding file will be transferred via post.

## STAFF ACCESS TO BOARDING ACCOMMODATION (REFER TO THE NMS FOR BOARDING SCHOOLS)

The Estates and Maintenance team access the boarding accommodation when required during the day when boarders are not in the accommodation. Best practice is for Estates and Maintenance team not to enter the accommodation alone but to work in pairs, although this is not always possible. Similarly, members of the Estates team, Maintenance or Domestic team do not enter the changing block alone and must ask for a chaperone if necessary. The Domestic Cleaners may enter to clean the boarding accommodation when the children are not in the accommodation, this usually being either when the children are having breakfast in the Dining Room or are in lessons.

## TRANSPORTING PUPILS

It is inadvisable for a teacher to give a lift in a car to a pupil alone. Wherever possible and practicable it is advisable that transport is undertaken other than in private vehicles, with at least one adult – this includes a Gap student, additional to the driver acting as an escort. If there are exceptional circumstances that make unaccompanied transportation of pupils unavoidable, the journey should be made known to a member of SLT and the pupil should always sit in the back seat of the car. Even if the parent gives permission for the child to be transported alone with the driver, it is not advisable.

Drivers must not allow a sole child to sit in the front of the vehicle, irrespective of which vehicle is being used or how short the travel distance is. If there are multiple passengers in the vehicle they must sit in the front seats of the vehicle, then they must be the first to get out of the vehicle so that, at no time, is the Driver in the position that a sole Child/Adult at Risk is left in the front seat.

## RESTRAINING PUPILS

Any physical restraint is only permissible when a child is in imminent danger of inflicting an injury on himself/herself or on another pupil, and then only as a last resort when all efforts to defuse the situation have failed. Another member of staff should, if possible, be present to act as a witness.

All incidents of the use of physical restraint should be reported immediately to the DSL and Headteacher and recorded in writing. The DSL and Headteacher will then decide what to do next. Where this relates to the school's EYFS setting, parents will be informed of any physical restraint used on their child the same day or as soon as reasonably practicable.

## CHANGING ARRANGEMENTS FOR PUPILS

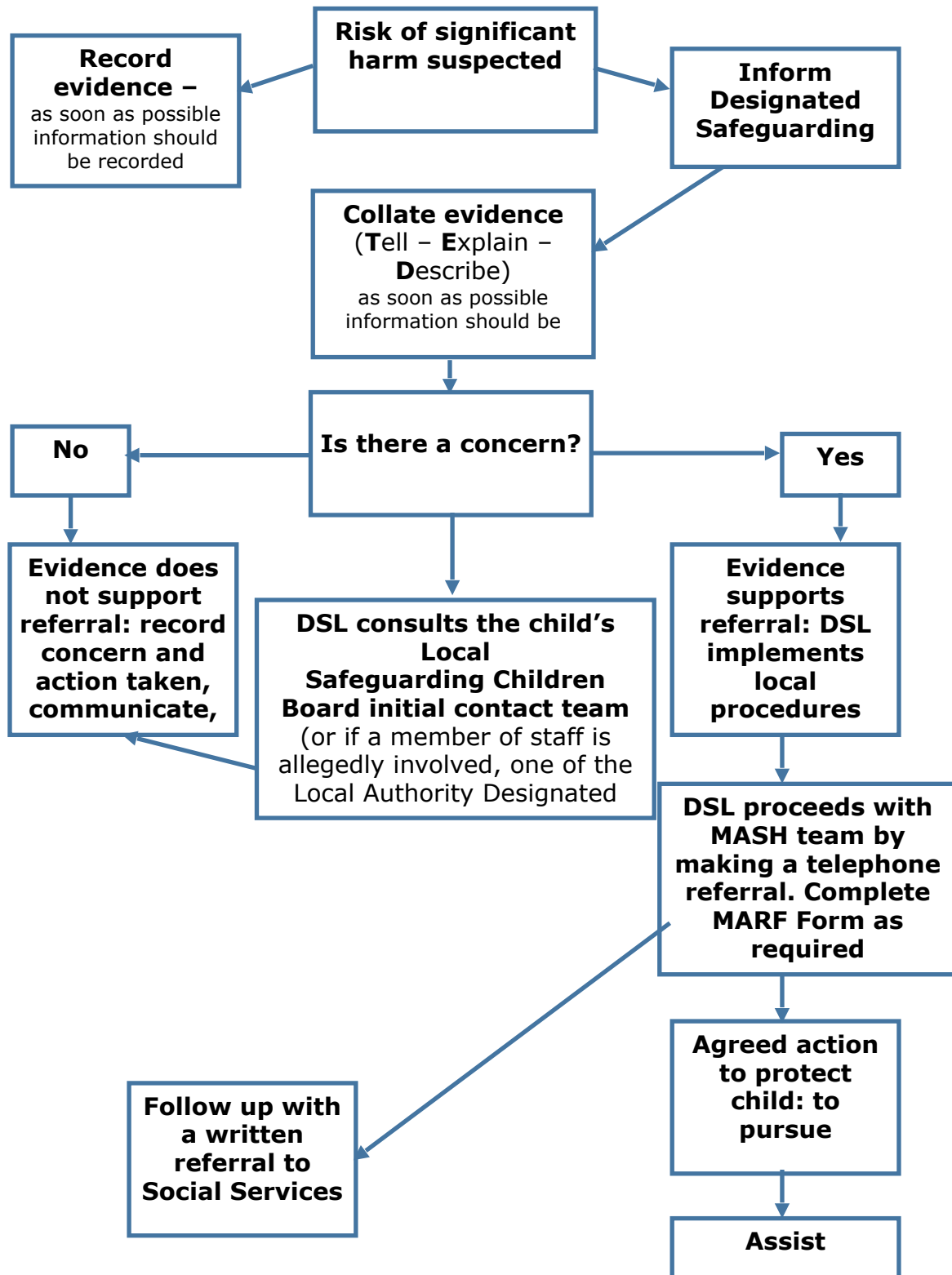
Refer to the Intimate Care Policy.

## COMPLAINTS

The Stowe Group Complaints Procedure is available on the school website. Any complaint arising from the implementation of this policy will be considered under the school's complaints procedure.

# APPENDIX A

## DIAGRAMMATIC REPRESENTATION OF THE SCHOOL'S INTERNAL PROCEDURES





# APPENDIX B

## A SUMMARY OF NSPCC FACTSHEETS JULY 2020/APRIL 2014 & DEFINITIONS FROM KCSIE SEPTEMBER 2024

<https://learning.nspcc.org.uk/media/1188/definitions-signs-child-abuse.pdf>

### What is child abuse?

Child abuse happens when a person harms a child. It can be physical, sexual or emotional, but can also involve neglect. Children may be abused by:

- family members
- friends
- people working or volunteering in organisational or community settings
- people they know
- strangers.

### b. General signs of abuse

Children experiencing abuse often experience more than one type of abuse over a period of time. Children who experience abuse may be afraid to tell anybody about the abuse. They may struggle with feelings of guilt, shame or confusion – particularly if the abuser is a parent, caregiver or other close family member or friend.

### c. Definitions and signs of child abuse

Many of the signs that a child is being abused are the same regardless of the type of abuse. Anyone working with children or young people needs to be able to recognise the signs. These include a child:

- being afraid of particular places or making excuses to avoid particular people
- knowing about or being involved in 'adult issues' which are inappropriate for their age or
- stage of development, for example alcohol, drugs and/or sexual behaviour
- having angry outbursts or behaving aggressively towards others
- becoming withdrawn or appearing anxious, clingy or depressed
- self-harming or having thoughts about suicide
- showing changes in eating habits or developing eating disorders
- regularly experiencing nightmares or sleep problems
- regularly wetting the bed or soiling their clothes
- running away or regularly going missing from home or care
- not receiving adequate medical attention after injuries.

These signs do not necessarily mean that a child is being abused. There may well be other reasons for changes in a child's behaviour such as a bereavement or relationship problems between parents or carers. If you have any concerns about a child's wellbeing, you should report them following your

organisation's safeguarding and child protection procedures.

#### **d. Child Abuse Definitions**

All school staff should be aware that 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.

**e. 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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

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

**h. Sexual Abuse** Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. 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 (also known as child on child abuse) in education and all staff should be aware of it and of the schools policy and procedures for dealing with it.

**i. Emotional Abuse** The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being

imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from 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.

**j. Child Sexual Exploitation and Child Criminal Exploitation (CCE)** Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

### **Child Criminal Exploitation (CCE)**

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation. Further information about CCE including definitions and indicators is included in Annex B of KCSIE (September 2023).

### **Child Sexual Exploitation (CSE)**

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship. Further information about

CSE including definitions and indicators is included in Annex B of KCSIE [September 2023].

**k. Harmful Sexual Behaviour** Harmful sexual behaviour (HSB) is developmentally inappropriate sexual behaviour which is displayed by children and young people and which may be harmful or abusive. It may also be referred to as sexually harmful behaviour or sexualised behaviour. HSB encompasses a range of behaviour, which can be displayed towards younger children, peers, older children or adults. It is harmful to the children and young people who display it, as well as the people it is directed towards.

HSB can include:

- using sexually explicit words and phrases
- inappropriate touching
- using sexual violence or threats
- sexual activity with other children or adults.

Sexual behaviour between children is considered harmful if one of the children is much older – particularly if there is more than two years' difference in age or if one of the children is pre-pubescent and the other is not [Davies, 2012]. However, a younger child can abuse an older child, particularly if they have power over them – for example, if the older child is disabled [Rich, 2011].

**l. Domestic Abuse** Domestic abuse is any type of controlling, coercive, threatening behaviour, violence or abuse between people who are, or who have been in a relationship, regardless of gender or sexuality. It can include physical, sexual, psychological, emotional or financial abuse. Exposure to domestic abuse is child abuse. Children can be directly involved in incidents of domestic abuse or they may be harmed by seeing or hearing abuse happening. Children in homes where there is domestic abuse are also at risk of other types of abuse or neglect.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. 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.

**m. Bullying and Cyberbullying** Bullying is when individuals or groups seek to harm, intimidate or coerce someone who is perceived to be vulnerable. Bullying includes:

- verbal abuse, such as name calling
- non-verbal abuse, such as hand signs or glaring
- emotional abuse, such as threatening, intimidating or humiliating someone
- exclusion, such as ignoring or isolating someone
- undermining, by constant criticism or spreading rumours
- controlling or manipulating someone
- racial, sexual or homophobic bullying
- physical assaults, such as hitting and pushing
- making silent, hoax or abusive calls.

Bullying can happen anywhere – at school, at home or online. When bullying happens online it can

involve social networks, games and mobile devices. Online bullying can also be known as cyberbullying. Cyberbullying includes:

- sending threatening or abusive text messages
- creating and sharing embarrassing images or videos
- 'trolling' - sending menacing or upsetting messages on social networks, chat rooms or online games
- excluding children from online games, activities or friendship groups
- setting up hate sites or groups about a particular child
- encouraging young people to self-harm
- voting for or against someone in an abusive poll
- creating fake accounts, hijacking or stealing online identities to embarrass a young person or cause trouble using their name.

**n. Child Trafficking** Child trafficking is child abuse. It involves recruiting and moving children who are then exploited. Many children are trafficked into the UK from overseas, but children can also be trafficked from one part of the UK to another.

Children may be trafficked for:

- child sexual exploitation
- benefit fraud
- forced marriage
- domestic servitude such as cleaning, childcare, cooking
- forced labour in factories or agriculture
- criminal exploitation such as cannabis cultivation, pickpocketing, begging, transporting
- drugs, selling pirated DVDs and bag theft.

Children who are trafficked experience many forms of abuse and neglect. Physical, sexual and emotional abuse is often used to control them and they're also likely to suffer physical and emotional neglect. Child trafficking can require a network of organised criminals who recruit, transport and exploit children and young people. Some people in the network might not be directly involved in trafficking a child but play a part in other ways, such as falsifying documents, bribery, owning or renting premises or money laundering (Europol, 2011).

Child trafficking can also be organised by individuals and the children's own families. Traffickers trick, force or persuade children to leave their homes. They use grooming techniques to gain the trust of a child, family or community. Although these are methods used by traffickers, coercion, violence or threats don't need to be proven in cases of child trafficking - a child cannot legally consent to their exploitation so child trafficking only requires evidence of movement and exploitation. Modern slavery is another term which may be used in relation to child trafficking. Modern slavery encompasses slavery, servitude, forced and compulsory labour and human trafficking (HM Government, 2014). The Modern Slavery Act passed in 2015 in England and Wales categorises offences of slavery, servitude, forced or compulsory labour and human trafficking.

**o. Female Genital Mutilation** Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. 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.

**p. Domestic Abuse** Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

**q. Serious Violence** All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

**r. County Lines** County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK), using dedicated mobile phone lines or other form of "deal line". Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes.

**s. Signs of Abuse** Whether or not a child's behaviour or appearance is concerning depends on their age or stage of development. Below are signs of potential abuse to look out for in children of specific age groups. Remember that children with learning difficulties, physical disabilities or health-related issues may be at a different developmental stage to most of their peers. However, children who have experienced abuse or neglect from a young age may also display developmental delays compared to children their own age. In such cases, the lack of a clear medical explanation for these delays may be an indicator of abuse.

### **t. Recognising signs of abuse at different stages of a child's development**

The information below describes signs of abuse in the context of stages of child development. It aims to help anyone working with children to distinguish between normal child behaviour and those injuries and behaviours which might indicate abuse.

#### **Infancy to preschool**

- Doesn't cry or respond to a parent's presence or absence from an early age (usually because they have learnt that their parent will not respond to their distress, this is known as a lack of attachment).
- Late in reaching developmental milestones such as learning to speak, with no medical reason.
- Acting out excessive violence with other children.
- Significantly underweight but eats well when given food.
- Talks of being left home alone or with strangers.

#### **Middle childhood**

- Talks of being left home alone or with strangers.
- Lacks social skills and has few if any friends.
- Shows lack of attachment to a parent.
- Becomes secretive and reluctant to share information.
- Acting out excessive violence with other children.

#### **School age (5 to 16 years)**

- Reluctant to go home after school.
- Unable to bring friends home or reluctant for practitioners to visit the family home.
- Poor school attendance and punctuality, or late being picked up.
- Parents show little interest in a child's performance and behaviour at school.
- Parents are dismissive and non-responsive to professional concerns.
- Is reluctant to get changed for PE etc.
- Wets or soils the bed.
- Acting out excessive violence with other children.

#### **Adolescence**

- Drinks alcohol regularly from an early age.
- Is concerned for younger siblings without explaining why.
- Becomes secretive and reluctant to share information.
- Talks of running away.
- Shows challenging/disruptive behaviour at school.
- Is reluctant to get changed for PE etc

**u. Physical Abuse** It is normal for children to have cuts and bruises on their bodies caused by accidents which happen whilst they are moving about and/or playing. These are marks that have an acceptable and reasonable explanation. Marks or injuries which do not have an acceptable explanation may indicate that a child has been abused. This may include:

## **Bruising**

- Bruises on the cheeks, ears, palms, arms and feet.
- Bruises on the back, buttocks, tummy, hips and backs of legs.
- Multiple bruises in clusters, usually on the upper arms or outer thighs.
- Bruising which looks like it has been caused by fingers, a hand, or an object i.e. belt, shoe etc.
- Large oval shaped bite marks.

## **Burns or scalds**

- Any burns which have a clear shape of an object, e.g. cigarette burns.
- Burns to the backs of hands, feet, legs, genitals, or buttocks.

Other signs of physical abuse include multiple injuries (i.e. bruising, fractures) inflicted at different times. It is particularly concerning if parents/carers are unable to explain these injuries and it is not clear whether they took the child to receive medical treatment at the time of the injury.

Be vigilant to possible abuse if a child is frequently described as ill by their parents but does not have any symptoms which are obvious to others. In addition, the parent will be unable to provide details of a medical diagnosis for the child's apparent condition.

There are other signs and indicators of abuse that are age specific.

## **Infancy to pre-school**

- Unexplained head injuries to a baby.
- Bruises on babies who are not yet crawling or walking.
- Acting out excessive violence either with toys or other children.

## **v. Sexual Abuse**

It is normal for children to show signs of sexual behaviour at each stage in their development. Children also develop at different rates and some may be slightly more or less advanced than other children in their age group. Behaviours which might be concerning depend on the child's age and the situation. Listed below are examples of 'normal' sexual behaviour in children.

### **Infancy to pre-school**

- Kisses and hugs others.
- Is curious about and looks at others private body parts; has limited understanding of privacy needs.
- Talks about private body parts.
- Uses words such as 'poo', 'bum' and 'willy' freely.
- Plays 'house' or 'doctor' games.
- Shows, touches, or rubs own genitals, or masturbates as a 'comfort' habit.

### **Middle childhood**

- Kisses and hugs others.
- Displays an interest in others' private body parts but is aware of the need for privacy.



- Talks about and occasionally shows private body parts to others.
- Uses words such as 'poo', 'bum' and 'willy' freely and delights in being 'shocking'.
- Sometimes uses swear words and/or 'sex' words copied from others.
- Plays 'house' or 'doctor' games.
- Sometimes touches or rubs own genitals, or masturbates as a comfort habit.

### **Pre-adolescent children (aged 10 to 12 years)**

- Kisses, hugs, and may 'date' others.
- Is interested in others' private body parts and in the changes occurring in puberty, is aware of the need for privacy.
- May ask questions about relationships and sexual behaviour.
- May look at sexual pictures including internet images.
- Masturbates in private.

### **Adolescents (aged 13 to 16 years)**

- Kisses, hugs, dates others, may have longer term relationships.
- Is interested in and asks questions about body parts, relationships and sexual behaviour. Is aware of the need for privacy.
- Uses sexual language and talks about sexual acts with peers.
- May look at sexual pictures including internet images.
- Masturbates in private.
- Experiments sexually with adolescents of similar age.

The following are age-specific signs and indicators of sexual abuse:

#### **Infancy to pre-school**

- Talking about sexual acts or using sexually explicit language.
- Having sexual contact with other children.
- Using toys or other objects in a sexual way.
- Becoming withdrawn or very clingy.
- Physical signs such as anal or vaginal soreness or an unusual discharge.

#### **Middle childhood**

- Masturbating in public.
- Showing adult-like sexual behaviour or knowledge.
- Using toys or other objects in a sexual way.
- Becoming withdrawn or very clingy.
- Physical signs such as anal or vaginal soreness or an unusual discharge.

#### **Adolescence**

- Masturbating in public.
- Having sexual contact with younger children or older adults.
- Pregnancy when the child does not have a boyfriend.
- Sexually transmitted diseases.

## **w. Neglect**

It is important to remember that some children are very picky eaters whilst others may refuse to wear a coat regardless of how cold it is outside. A child may also appear to be underweight, but is, in fact, naturally thin. Some of the most obvious signs of neglect (e.g. children being thin, dirty or not wearing a coat) are not in themselves indicators of abuse. However, if, over time, it is clear that a child is not receiving an adequate level of care and supervision appropriate to their age, it may indicate that the child is being neglected. The following are general and age-specific signs of neglect.

### **General signs of neglect for children of all age groups:**

- medical needs are not being met: not being registered with a G.P.; not being taken to the dentist despite having obvious dental problems; failing to ensure that the school has a child's medication, e.g. asthma inhalers
- not taking the child to see a doctor when they are ill or have been injured.

There are other signs and indicators of neglect that are age-specific.

### **Infancy to pre-school**

- Frequent and untreated nappy rash.
- Child has numerous accidental injuries and the explanations given suggest a lack of supervision.
- Immunisations are not up to date.
- Child is significantly underweight but eats well when observed.

### **Middle childhood**

- Child has poor school attendance and punctuality and is often picked up late at the end of the day.
- A child is frequently tired at school due to a lack of routine at home (e.g. regular bedtimes).
- Parents are unsupportive and uninterested in the child's education
- A child frequently appears to be hungry and does not have a packed lunch or money to buy food.

### **Adolescence**

- A child is often tired at school due to a lack of routine at home (e.g. regular bedtimes).
- A child frequently appears to be hungry and does not have a packed lunch or money to buy food.
- Parents are dismissive and non-responsive to professional concerns (e.g. the need for medical care or taking action over bullying).

## **x. Emotional Abuse**

It is important to remember that some children are naturally open and affectionate whilst others are quieter and more self-contained. Children also develop at different rates from one another and some may be slightly more or less advanced than other children in their age group. Mood swings and challenging behaviour are

also a normal part of growing up for teenagers and children going through puberty. Be alert to behaviours which appear to be out of character for the individual child.

The following signs may indicate emotional abuse for children of all age groups:

- inappropriate knowledge of 'adult' matters such as sex, alcohol and drugs
- extreme emotional outbursts
- regularly experiencing nightmares or sleep difficulties.

There are other signs and indicators of emotional abuse that are age specific.

### **Infancy to pre-school**

- Over-affectionate towards strangers or people they haven't known for very long.
- Lacks confidence and is often wary or anxious.
- Displays lack of attachment to parent, e.g. when being taken to or collected from nursery etc.
- Is frequently aggressive or nasty towards other children and animals.

### **Middle childhood**

- Frequently soils the bed.
- Language and behaviour are not socially appropriate.
- Struggles to control strong emotions.
- Shows lack of attachment to a parent.
- Lacks social skills and has few if any friends.
- Self-harms, e.g. scratching, head banging.

### **y. What to do if you are concerned about a child**

Anyone who is concerned that a child is at risk of abuse or neglect should follow their organisation's child protection procedures. Or they can contact the NSPCC on 0808 800 5000 for advice and support about what action they can take to safeguard a child they are working with.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. This is known as contextual safeguarding.

### **z. References**

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## APPENDIX C

# PROCEDURE WHEN A MEMBER OF STAFF, VOLUNTEER, SAFEGUARDING LEAD OR HEAD FACES ALLEGATIONS OF ABUSE

### Introduction

Allegations that a member of staff has abused a pupil or pupils either inside the school premises or during a school trip or visit could be made by:

- Parents
- The abused pupil
- Other members of staff
- Other pupils
- The Police or Social Services
- A third party

An allegation of such seriousness would normally be made directly to the Head; but if another member of staff is told first, he/she will ensure that the Head is informed immediately. The Local Area Designated Officer should then be informed. If the Head is implicated, the Chairman of Governors should be told at once. The Local Area Designated Officer should then be informed, without informing the Head. In all cases, the School would not investigate before referral to the DESIGNATED OFFICER (DO/LADO).

### Anonymous Allegations

Any anonymous allegation of child abuse which names both a member of staff and a child, will be dealt with as per policy procedure. The member of staff will be interviewed if the allegation names the member of staff, but not the pupil. It could be appropriate to establish a mentoring or review programme for that individual, or to provide him or her with further training. A record would be kept on the individual's personal file.

### First Response

Response will be prompt and sensitive to the legitimate concerns of the victim and his or her family. We undertake to:

Take any allegation of abuse, involving a member of staff, seriously;

Establish the facts;

Contact the DESIGNATED OFFICER (DO/LADO) for advice re: procedure;

Inform the member of staff concerned honestly of the allegation that has been made, and advise him or her to contact their Trade Union or Professional Association for advice and support;

Suspension will be considered;

Inform the child's parents in confidence, inviting them to maintain confidentiality whilst the investigation takes place.

Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

## **Suspension**

Suspension of a member of staff is a neutral act and does not imply that any judgement has been reached about his or her conduct. Suspension will follow legal advice where:

There is a serious risk of harm (or further harm) to the child;

The allegations are so serious as to constitute grounds for dismissal, if proven;

The police are investigating allegations of criminal misconduct.

In addition:

Any member of staff who is invited to a meeting whose outcome is likely to result in his or her suspension, is entitled to be accompanied by a friend or Trade Union representative. Staff do not have a right to legal representation;

Boarding school, or other accommodated staff, who are suspended will be required to remain off-site for the duration of their suspension.

The suspended member of staff will be kept informed of the progress of the investigation.

## **Alternatives to Suspension**

Sending the member of staff on leave;

Considering non-contact duties;

Second adult present when staff member has contact with children.

## **Resignation**

The resignation of a member of staff or volunteer mid-way through an investigation would not lead to the investigation being abandoned.

## **Compromise Agreements**

The policy at Swanbourne House School is to follow the KCSIE September 2024 guidance on the use of compromise agreements in cases of child abuse which is:

If the accused person resigns, or ceases to provide their services, this should not prevent an allegation being followed up in accordance with this guidance. A referral to the DBS must be made, if the criteria are met. If the accused person resigns or their services cease to be used and the criteria are met it will not be appropriate to reach a settlement/compromise agreement. A settlement/compromise agreement which prevents the school or college from making a DBS referral when the criteria are met would likely result in a criminal offence being committed as the school or college would not be complying with its legal duty to make the referral. ”

## **Referral to the Disclosure and Barring Service / Teaching Regulation Agency**

Swanbourne House has a statutory legal duty to refer an individual, where there is the risk that he or she may harm, or has caused harm to children, to the Disclosure and Barring Service (DBS) and National College of Teachers and Lecturers (NCTL) within one month of the individual's dismissal or resignation because he or she has been considered unsuitable to work with children. Reports concerning members of staff or volunteers are

normally made by the DSL. If the DSL is implicated, the report is made by the Head. If the Head is implicated, the report is made by the Chairman of Governors.

The referral form can be downloaded from the DBS. The school plays no part in the subsequent process of barring individuals from working with children and/or vulnerable groups. We also have a legal duty to respond to any requests for information that we receive from the DBS and NCTL at any time.

In the case of a proven case of professional misconduct, a report would be made to the Teaching Regulation Agency by the Head, or, in the case of the Head facing such a case, by the Chair of Governors.

## **Recording**

All allegations of abuse, investigations and any disciplinary actions will be recorded on an individual's file. A copy will be given to the individual and he or she will be told that the record will be retained until he or she reaches statutory retirement age, or for ten years, if that is longer.

Due regard is taken concerning public statements about child protection with reference to the Education Act of 2011.

## **Discipline and Suitability Process**

The DESIGNATED OFFICER [DO/LADO] and the DSL should discuss whether an internal disciplinary investigation is appropriate in cases where:

It is clear at the outset or when decided by a strategy discussion, that a Police investigation or Social Care enquiry is not necessary, or

The employer or the DESIGNATED OFFICER [DO] is informed by Police or the Crown Prosecution Service [CPS] that a criminal investigation and any subsequent trial is complete, or that an investigation is to be closed without charge, or a prosecution discontinued, or

Where the Police and CPS formally agree to a disciplinary investigation running concurrently with their own investigations.

The discussion should consider any potential misconduct and/or suitability issues on the part of the member of staff and take into account:

Information provided by the Police and/or Social Care.

The result of any investigation or trial.

The different standard of proof in disciplinary and criminal proceedings.

If formal disciplinary action is not required, the school will institute appropriate action within 3 working days. If a disciplinary hearing is required, and further investigation is not required, the hearing should be held within 15 working days.

If further investigation is needed to decide upon disciplinary action, the DSL and the DESIGNATED OFFICER [DO] should discuss whether the school has appropriate resources or whether the school should commission an independent investigation because of the nature and/complexity of the case and in order to ensure objectivity.

The aim of an investigation is to obtain, as far as possible, a fair, balanced and accurate record in order to consider the appropriateness of disciplinary action and/or the individual's suitability to work with children. Its purpose is not to prove or disprove the allegation.

The investigating officer should aim to provide a report within 10 working days.

On receipt of the report the school will decide within 2 working days, whether a disciplinary hearing is needed. If a hearing is required, it should be held within 15 working days.

If at any stage, new information emerges that requires a child protection referral, the disciplinary investigations should be held in abeyance and only resumed if agreed with Social Care and the Police. Consideration should again be given as to whether suspension is appropriate in light of the new information.

### **Supply, Contract, Volunteer Workers & Out of hours contracts.**

In the case of supply, contract and volunteer workers, normal disciplinary procedures may not apply. In these circumstances, the DESIGNATED OFFICER (DO) and employer should act jointly with the providing agency, if any, in deciding whether to continue to use the person's services, or provide future work with children, and if not whether to make a report for consideration of barring or other action. Swanbourne House Out-of-hours hire contracts working with children align with the expectations in Keeping Children Safe in Out-of-schools Settings.

### **Sharing Information for Disciplinary Purposes**

Wherever possible, Police and Social Care should, during the course of their investigations and enquiries, obtain consent to provide the employer and/or regulatory body with statements and evidence for disciplinary purposes.

If the Police or CPS decide not to charge, or decide to administer a caution, or the person is acquitted, the Police should pass all relevant information to the employer without delay.

If the person is convicted, the Police should inform the employer straight away so that appropriate action can be taken.

### **Unsubstantiated Allegations**

Both the child and member of staff may feel isolated, vulnerable and with diminished self-esteem.

Child A professional care programme will be recommended.

Staff A mentoring programme and professional counselling will be offered. A short period of re-training or a short sabbatical may be appropriate.

Allegation of Abuse by a Member of Staff Against a Child who is not a Pupil at  
Swanbourne House



Procedure would be the same as for an allegation with a Swanbourne House pupil except that the school would not take part in any investigatory process.

Allegation of Abuse by the Head or DSL

The Head or DSL would normally be suspended for the duration of the investigatory process.

## APPENDIX D

# GUIDANCE ON PUPIL AND STAFF ACCEPTABLE USE OF ICT, MOBILE PHONES AND OTHER ELECTRONIC DEVICE

### Statement

Technology plays an enormously important part in the lives of all young people. Sophisticated games consoles, or PSPs (play stations portable), like Wiis and Nintendo DS, together with internet-enabled mobile phones provide unlimited access to the Internet, to SMS messages, to blogging (web logging) services (like Twitter), to Skype (video calls, via web cameras built into computers, phones and PSPs), to wikis (collaborative web pages), chat rooms social networking sites (such as Facebook and Instagram) and video sharing sites (such as YouTube). Staff and governors are aware of the risks of child-on-child abuse for children and young people when using mobile technology.

Technology has transformed teaching and learning in all educational settings. It is a crucial component of every academic subject, and is taught as a subject in its own right. All classrooms are equipped with electronic whiteboards, projectors and computers. We store laptops and iPads in lap trucks outside of classrooms. We have computing suites in the school and pupils may use the machines there and in the library for private study. There are also computers in other locations around the school (for example in the Music Room). Our Boarding House is equipped with some computers too.

### Aims

We believe this communications revolution gives young people unrivalled opportunities but we are aware that it also brings risks. It is an important part of our role at Swanbourne House School to teach our pupils how to stay safe in this environment as per their developmental age and how to avoid making themselves vulnerable to a range of risks, including identity theft, bullying, harassment, grooming, stalking and abuse. They also need to learn how to avoid the risk of exposing themselves to subsequent embarrassment.

### Staff Mobile Phones and personal devices, including photography

Staff may use their personal devices for work purposes e.g. retrieving material for lessons, checking the time, contacting the school during trips.

Staff should use their personal devices for private business out of sight and away from children, other than in an emergency.

Personal devices may not be used, other than in an emergency, in the children's toilets, nappy changing areas, pupil changing rooms, swimming pool or in the boarding dormitories and pupil common rooms. Personal mobile phones belonging to the EYFS staff are not to be used throughout contact time with the children and are put out of sight.

EYFS Staff are not permitted to use recording equipment on their personal mobile phones to take photos or videos of EYFS children they are to use school recording equipment for all observational records.

The ban on the use of mobile phones in the EYFS setting extends to all visitors and parents; signs are in place to enforce this.

Staff may not use personal devices for taking photographs at school or of school events, nor will they store such images on their own computers or electronic devices at home. (It is understood that staff with children in school may take photographs of their children with their personal devices for use at home). There is a bank of school devices kept by some key senior staff which can be used for photography for marketing purposes; Staff are to be aware of any child who does not have consent for photographs;

- Personal phones may be used in the case of an emergency e.g. in the event of an evacuation of the building;
- No children's/parents numbers are to be stored on personal phones - If used, they must be deleted immediately;
- If mobile phones are left turned on, they must be on silent;
- Personal mobile phones must only be used on staff's designated breaks and must be used away from the children, other than in an emergency;
- Staff must not text, email or post anything on a website that could be construed to have an impact on the School's reputation;
- Staff must not text, email or post anything on a website that would offend any other member of staff, parent or member of the school community, e.g. intimidation or bullying.

To facilitate this policy mobile phones will be provided for each minibus and in the office for trips where minibuses are not required.

### **Technical Staff**

With advances in technology, blocking and barring sites is no longer adequate. We need to teach all of our pupils to understand why they need to behave responsibly if they are to protect themselves. Our technical staff have a key role in maintaining a safe technical infrastructure at the school and in keeping abreast with the rapid succession of technical developments. Good practice and duty of care extends to monitoring and dealing with breaches of our policy, lawfully, should they arise. We recognise that Internet safety is a child protection and general safeguarding issue.

### **Illegal Material**

Illegal activity will be reported to the police and/or the Local Child Safeguarding Board (LCSB). If any child is at specific risk as a consequence of online activity, we may seek assistance from the Child Exploitation and Online Protection Unit (CEOP).

Any child who misuses technology to bully, harass or abuse another pupil will be age appropriately sanctioned and/or given counselling.

### **Conflict with school business**

School IT facilities cannot be used for private business or fund raising that is not supported by the school.

### **Parents and Guardians**

Swanbourne House works closely with parents and guardians in promoting a culture of online safety.

"Children and young people need to be empowered to keep themselves safe. This isn't just about a top-down approach. Children will be children - pushing boundaries and taking risks. At a public swimming pool

we have gates, put up signs, have lifeguards and shallow ends; but we also teach children how to swim.” Dr Tanya Byron “Safer Children in a digital world: the report of the Byron Review”.

Digital safety is a whole school responsibility.

### **Cyberbullying**

Cyberbullying is a particularly unpleasant form of bullying, because it is direct to the child, can be anonymous and a victim can be targeted at any time or place.

The Anti-Bullying Policy describes preventative measures and procedures that will be followed when there are cases of alleged bullying.

Proper supervision of pupils plays an important part in creating a safe ICT environment at school; but everyone needs to learn how to stay safe outside the school.

Alleged bullying and harassment in any form should always be reported to a member of staff.

### **Treating Other Users with Respect**

- We expect pupils to treat staff and each other online with the same standards of consideration and good manners as they would in the course of face to face contact;
- Staff do not normally communicate on a personal basis with pupils by e-mail and we would not expect them to communicate with pupils by text or mobile phones;
- Everyone has a right to feel secure and to be treated with respect (Anti-Bullying policy on the Public and Parents’ website);
- All pupils are encouraged to look after each other, and to report any concerns about the misuse of technology, or worrying issue to a member of the pastoral staff.

### **Keeping the School Network Safe/Filtering and monitoring**

Certain sites are blocked by our filtering system; DSL has worked closely with IT within The Stowe Group.

Any reported misuse/rumours of misuse of the network by pupils or staff is investigated by our IT Department and DSL

All prep school pupils are assigned their own email address, accessed with password protected personal login.

The new devices for Year 7 and Year 8 pupils have a safeguarding package installed – Senso and Classroom cloud.

CPD is provided to staff and parents to ensure that all pupils are safe online, within and outside of school.

### **General Guidance**

No child should post anything that they would not say to their grandparent;

PSHE lessons from the Year 6+ show how pupils can identify signs of cyber-stalking, and what they should do if they are worried about being harassed or stalked online;

Year 3+ are taught safer social networking during Computing and PSHE lessons.

Children are taught how to:

- keep personal details safe;
- recognise and avoid unknown attachments and report illegal content;
- Activate mobile phone filters and block nuisance callers.

### **Pupil Mobile Phones**

Swanbourne House is committed to safeguarding and promoting the welfare of children at School. As part of our Safeguarding policy we expect staff and pupils to follow this protocol on communication by mobile phone. Throughout this protocol, the word mobile phone includes a smart watch able to connect to the internet or similar devices.

### **Pupils are not allowed mobile phones in school.**

#### **Exceptions:**

- Boarders are allowed mobile phones which are signed into the Boarding House.
- All boarders who bring their mobile phone / ipad into school will be required to sign a mobile phone user agreement, which states that their devices should not be used in dormitories or bathroom areas, and must be handed in overnight.
- Boarders' mobile phones are kept with the Boarding House Parents and can only be used with permission, and within designated areas.
- Boarders' iPads and other personal electronic devices are switched off and stored in the charging facility during the school day. They may be used in the Boarding House after school but must be handed in overnight.

#### **Sanctions:**

- Mobile phones are confiscated from day pupils. These are handed in to the Assistant Head from whom parents may recover them;
- Staff may confiscate personal equipment that is being used during the school day from Boarders. These may be handed to the Boarding House Parents;
- Additional sanctions may be applied if appropriate.

### **Use of mobile phone communication between staff and pupils**

- Staff should avoid using mobile phones to speak to pupils or to send them a message or vice versa, unless it is an emergency;
- Any messages that are sent should be brief and courteous;
- Staff should not send calls or texts of a personal nature to pupils or vice versa.

### **Emergencies**

Staff on supervisory duties in the playground, on the playing fields or on trips may carry and use a mobile phone to seek assistance or pass messages in the case of emergencies, but it is understood that these devices should not be used for checking of emails or similar while carrying out supervisory duties.

### **Out of School Hours or on Activities**

- Staff should avoid using mobile phones to speak to pupils, send a messages or vice versa outside School;
- Staff should not store pupil's mobile phone numbers;
- Any messages should be brief and courteous.

### **Inappropriate communication**

If there are reasonable grounds to believe inappropriate communications have taken place between staff and pupils or members of staff, the Head may require relevant mobile phones to be produced for examination.

If there are reasonable grounds to believe a breach has occurred, the usual grievance or disciplinary procedures would apply in relation to either the safeguarding of pupils, vulnerable groups or harassment/ bullying at work.

### **Inappropriate holding of numbers (Data)**

- Parent or staff numbers used for professional reasons should be deleted from personal units after use;
- Colleagues numbers stored for personal reasons are to be held in confidence and not used whilst working;
- The Head (data controller) will advise if staff wish to e-communicate re: alleged harassment/ bullying.

### **Guidance on Accessing Inappropriate Sites at School**

- Staff may not access inappropriate material on the premises;
- Downloading inappropriate material will instigate disciplinary procedure;
- Concerns re: inappropriate sites or images used by staff or children are to be reported to either Assistant Head, Deputy Head or the Head;
- Staff are asked to refer to the Whistleblowing Policy re: referrals of colleagues

### **Guidance on Social Networking**

- Pupils are not allowed to use social networking sites except as part of a lesson under direct supervision; pupils are educated about the safe use of social media and other aspects of online safety.
- Staff may use private devices during their own time and in child restricted areas;
- Staff may not be Facebook (or equivalent site, e.g. Instagram) friends with current pupils; it is good practice not to commit to such relationships with current parents too.
- Further guidance on social networking is offered by all leading unions.

# APPENDIX E

## JOB DESCRIPTION OF DESIGNATED SAFEGUARDING LEAD AND DEPUTIES

Main Responsibilities of the Designated Safeguard Leads and Deputies are set out in KCSiE September 2024 Annex C. The Designated Safeguarding Leads and Deputies are expected to:

### **Manage referrals**

- 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 referrals to the Channel programme;
- 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.

### **Be responsible for the online safety of the children**

#### **Work with others**

- Liaise with the Head 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 (as described in Part 4 of KCSiE) and the designated officer(s) at the local authority for child protection concerns regarding all cases which concern a staff member;
- Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.
- Lead responsibility for Filtering and Monitoring with the support of IT within the Stowe Group.

#### **Undertake training**

The Designated Safeguarding Lead should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.

The Designated Safeguarding Lead should undertake Prevent awareness training and lead on The Prevent Duty across the school. In addition to the formal training set out above, their 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, but at least annually, to allow them to understand and keep up with any developments relevant to their role so that they:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;

- 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's child protection policy and procedures, especially new and part time staff;
- Are alert to the specific needs of children in need, those with special educational needs and young carers;
- Are able to keep detailed, accurate, secure written records of concerns and referrals;
- Understand and support the school or college with regards 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;
- 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 policies are 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 the Governing Board regarding 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 local Safeguarding Partners to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

### **Child protection file**

Where children leave the school ensure their child protection file is transferred to the new school or college with 5 working days or as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained.

### **Availability**

During term time the Designated Safeguarding Lead (or a Deputy) should always be available (during school hours) for staff in the school to discuss any safeguarding concerns. In exceptional circumstances this discussion could be by phone or email, but face to face discussion is preferred. The DSL will always be contactable on the Safeguarding Mobile 07732 600379. In rare circumstances the mobile will be handed to a DDSL.

In the DSL's absence from school one of the Deputy DSLs should be aware and make themselves available for staff to raise any safeguarding concerns.



# **APPENDIX F**

## **WRITING UP A PUPIL SAFEGUARDING DISCLOSURE**

### **What to include in the MyConcern box: Details of Concern**

**1.1** Time (use 24 hour clock), date (dd/mm/yy) and location (be specific – back of classroom X, common room in X boarding house) of the disclosure conversation (who is making the report will be automatically generated via doing it on MyConcern – if in any other format please record this detail)

**1.2** Document the full details of the child (name, age, school house)

**1.3** Exact words used by the child about the incident or concern raised

**1.4** Record exactly what questions, if any are asked of the child. Open ended questions should be used: Tell me, Explain to me, Describe to me (TED) or when, where, what, how, who, why. Get clarification on words – feeling low will be different for everyone in how they experience it so don't assumption their feeling low is the same as yours.

**1.5** Location and day/time of the incident

**1.6** Establish whether anyone else was present at the time of the incident and why? (pupils or staff use full names)

**1.7** Who else has the pupil reported to? What action was taken and by who?

**1.8** Use the body map function on MyConcern to record any physical marks/injuries. (Don't know how you want to word this.....we can't have staff grabbing or touching pupils to see marks e.g. grabbing an arm to push a jumper up to see cuts on a wrist. It should also be recorded if the staff member asked to see any physical injuries and why)

**1.9** Why as the member of staff, you are concerned?

**1.10** All information recorded should be:

- Legible and written using straightforward language (use bullet points if easier)
- Using a child's own words (verbatim) as much as possible
- Factually accurate, i.e. not opinion

Remember the individual has chosen you to talk to so listen in a non-judgmental way, show empathy, don't jump to conclusions or make assumptions.

There are no barriers to sharing a safeguarding concern.

**Example of Good Practice:**

Spoke to Joseph Bloggs (3rd form Cobham) on 22/04/2021 at 15:00 in Assistant Head's Office

Present at the meeting: Joseph Bloggs and Mrs Katie Markey (DSL)

Joseph said "When I was standing in the supper queue, John Smith\* punched me in the back of the head 5 or 6 times and took my phone from my hand and would not let me have it back"

[\*after this immediate disclosure – Katie Markey showed Joseph the pictures of the 2 John Smiths on ISAMs and Joseph pointed out it was John Smith in 5B].

Katie Markey asked Joseph – 'Has this happened to you before?'

Joseph Bloggs – Yes, it happens most meal times, but this is first time he has stolen my phone.'

Katie Markey – 'How long as this happened for?'

Joseph Bloggs – 'Since January 2021 – so about 4/5 months'

Katie Markey – Are there any witness to John's behaviour?'

Joseph Bloggs – 'Yes, my friend Colin Lules, I always go to meals with him, so he has always witnessed it'

Etc etc

I am concerned and want to raise this as a possible safeguarding concern due to physical violence Joseph has encountered for the past 4 months as well as the most recent theft of his phone.'

I am the first person Joseph has spoken to about this due to fear of recrimination from John and his friends.