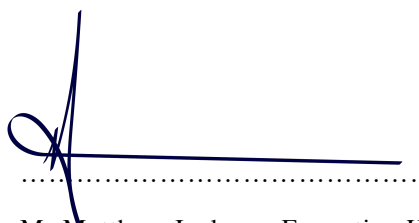


SAINT PETER'S
— *International College, France* —

Child Protection and Safeguarding Policy

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Mr Matthew Jackson, Executive Head Master

1. Overarching Statements

1.1 The Governing Body and Senior Leadership Team of Saint Peter's International College fully recognise their responsibilities under the Acts, Regulations and Guidance listed in the Appendices of this policy to safeguard and promote the welfare of pupils and to work together with other agencies to ensure adequate arrangements within the College to identify, assess and support those pupils who are at risk of suffering harm or who are suffering harm or in need of help. Safeguarding is everyone's responsibility. The College has a culture of safety, equality and protection which enables issues about safeguarding and child welfare to be addressed.

1.2 This policy aims to ensure that all staff are alert to the signs of abuse and neglect, and that they are familiar with the procedures as to how to report any concerns. It aims to raise awareness of individual responsibilities and to provide a means of monitoring, recording and reporting cases of abuse.

1.3 When concerned about the welfare of a child, the best interests of the child and the best possible outcome for the child will always be the priority. Pupils are listened to.

1.4 It is a key role of the College to support pupils and provide stability in the lives of pupils who may be at risk of harm. It is also recognised that pupils can be vulnerable and exploited by others. Staff will be alert to the signs of vulnerability.

1.5 Key contacts:

Mr Matthew Jackson, Executive Head Master - mjackson@stpetersfr.com

Mrs Kathrine Law, DSL - klaw@stpetersfr.com

Fr Simon Henry, Chair of Governors - sphenry@stpetersfr.com

1.6 In addition the College will appointed a number of staff to act as Supervisors to ensure that the whole campus is covered at all times.

1.7 All safeguarding matters must be ultimately directed to the DSL. They takes the lead role in all safeguarding matters throughout the College. Any matters dealt with by Supervisors will be reported fully to the DSL as soon as possible. All the above persons and the Executive Head Master will have undergone the appropriate training.

2. To Whom does this Policy apply, and where does it apply?

2.1 This policy applies to all staff in the College (which includes any person working at the College whether under a contract of employment or contract of services, governors and volunteers) and to all pupils enrolled at the College. Organisations working with pupils hiring the College's facilities may adopt this policy on College premises in preference to their own, but must notify the College which policy they are following as per the hiring and lettings policy.

2.2 All staff have a responsibility to provide a safe environment within which pupils can learn and reach their full potential whilst identifying pupils who may be in need of early help or who are suffering, or are likely to suffer, significant harm. All staff should work with other services as needed by sharing concerns and taking prompt action.

2.3 Recognising that Saint Peter's is an International school in France, we still expect that according to the Teacher Standards, DfE, 2013, we should 'uphold public trust in the profession and maintain high standards of ethics and behaviour, within and outside College, by...having regard for the need to safeguard pupils' well-being, in accordance with statutory provisions'. Saint Peter's expects equally high standards of all employees and volunteers.

2.4 The legal definition of "pupils" includes everyone under the age of 18 years. At Saint Peter's, this definition is extended to include all learners, irrespective of age, who are afforded the rights and protections afforded by this policy. In this policy, the term "child" and "pupil" are used interchangeably.

2.5 The College also recognises that some employees are under the age of 18 and also affords them the rights and protections set out in this policy. Employees also have the full rights afforded under current employment law and may seek recourse to these.

2.6 This policy applies wherever staff are working with pupils – even if they are away from the College – for example on trips. This policy also applies if an alleged incident has taken place between (two or more) pupils away from the College premises.

2.7 The College recognises that pupils may be particularly vulnerable in the boarding setting, and early years. Specific guidance which applies to boarding may be found at para 20.3 below. The College is also alert to the fact that certain groups of pupils may be particularly vulnerable to bullying and peer on peer abuse. Children with SEND can face additional safeguarding challenges, for example being socially isolated or unable to communicate well, and may not always show outward signs of distress. Possible indicators of abuse (such as behaviour, mood and injury) may be misunderstood as being related to their disability. This policy recognises that abuse could occur from both inside and from outside the College, and could be from an adult or child.

2.8 This policy applies equally to all pupils, irrespective of race, colour, national, ethnic or social origin, disability or special educational needs and should be read in conjunction with all our policies.

2.9 It is recognised that the field of child protection is ever changing and new risks to pupils will present themselves, particularly given the pace at which technology evolves. The College has developed a Digital Safety Policy to address technological risks and it forms an integral part of the College's suite of safeguarding materials. Child protection will always be a primary consideration when drafting any policy.

3. Safeguarding, Wellbeing and Child Protection

3.1 Safeguarding is defined as:

- Protecting pupils from maltreatment;
- Preventing impairment of pupils' health or development;
- Ensuring that pupils grow up in circumstances consistent with the provision of safe and effective care and
- Taking action to enable all pupils to have the best outcomes.

3.1.1 The types, definitions and signs of harm that a child may suffer are identified in the Appendices of this policy.

3.2 Child protection is an element of safeguarding and promoting welfare, and refers to the action that is undertaken to protect specific pupils who are suffering or are likely to suffer harm.

3.3 The College plays a significant part in the prevention of harm to our pupils by providing good lines of communication with trusted adults, supportive friends and an ethos of protection. Included within this is the emotional wellbeing of pupils and the role that the College plays in identifying those pupils who may be vulnerable to radicalisation or exposed to extremist views.

3.4 The College will continue to develop effective working relationships with all agencies involved in safeguarding pupils. Timely, proactive, and open sharing of information between professionals and local agencies is essential for effective identification and assessment of issues and identification of the relevant services to provide support. Early sharing of information is the key to providing effective early help where there are emerging problems. At the other end of the continuum, sharing information can be essential to put in place effective child protection measures.

4. Management of Safeguarding

4.1 The Governing body is ultimately responsible for all matters of Safeguarding and Child Protection. The Governing body appoints the Designated Safeguarding Lead (DSL) for safeguarding and child protection from the senior leadership team (SLT), and at least one deputy designated safeguarding lead. The DSL is a member of the SLT and has the status and authority within the College to carry out the duties of the post including committing resources, developing strategy, organising training and, where appropriate, supporting and directing other staff. They are the primary point of contact in safeguarding matters.

4.2 The DSL may be contacted at any time – the staff have emergency contact numbers for the DSL.

4.3 If any person has a concern that a child has suffered harm or is in danger of harm, they should contact the DSL or, in their absence, the Executive Head Master. A log of the concern should be written and submitted as soon as possible, often immediately, and always within 24 hours of becoming aware of the issue. Early intervention is key to address risks and prevent issues escalating. This includes allegations of abuse which may involve staff members. Staff should not assume that somebody else will take action, and must share any information appropriately to ensure that a child is kept safe. Staff must familiarise themselves with the whistleblowing policy.

4.4 If any staff member is concerned about a child's welfare, health or development but no specific allegation of abuse has been made, they should always discuss their concerns with the DSL.

4.5 The DSL will decide whether to contact the Executive Head Master, but a member of staff can also refer concerns directly to the Executive Head Master. Direct referrals should

be reported to the DSL as soon as possible thereafter, unless the circumstances at paragraphs 11.4 and 11.5 apply (allegations against the DSL or Executive Head Master). If in exceptional circumstances the DSL is not available, staff should consider speaking to another member of the Senior Leadership Team. Any action taken must be shared with the DSL as soon as is possible.

4.6 Full written records of any concerns will be made and kept securely, in the case of prior written records, in paper form by the DSL, but moving forward, electronically.

4.7 Parents are welcome to approach the DSL if they have any concerns about the welfare of any child in the College, or alternatively may discuss concerns with the Executive Head Master.

4.8 In the event that contact with social care is necessary, the DSL will:

- Make records of any discussions with the child, staff or other agencies;
- Take advice from social care if the case does not appear clear cut in the DSL's mind. This advice may be to continue to monitor the situation or proceed to making a formal referral, in which case the DSL should follow such advice and maintain close contact with local authorities. This decision should be communicated to the individual raising the initial concern unless there is advice to the contrary from social care or other statutory agency.
- Recognise that all matters relating to child protection are confidential, and that personal information about a child will only be disclosed to other members of staff on a need to know basis;
- Inform and liaise with the child's parents or guardian of any intention to inform social care and/or the police of concerns, unless it is suspected that this might place the child at greater risk or jeopardise a police enquiry - the DSL will take advice from social care and the police where appropriate.

4.9 In addition the DSL will:

- Lead on matters of digital safety;
- Maintain an overview of safeguarding within the College, adopting a contextual approach to safeguarding which takes account of wider environmental factors which are present in a child's life and which are a threat to their safety or welfare;
- Arrange for any cases where a person is dismissed, removed or has left due to risk of harm to a child to be reported to the appropriate agency as required;
- Support and liaise with other staff as appropriate to keep them apprised of issues, for example the Executive Head Master or case manager when allegations have been made against staff, and act as a source of support to staff who have made referrals or who are considering doing so;
- Recognise that staff who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.
- Monitor the effectiveness of the College's safeguarding and child protection policies and procedures;

- Ensure that any child protection file is securely transferred to a new school as soon as possible in the event that a pupil leaves.

4.10 The College has a systematic means of monitoring pupils known or thought to be at risk of harm and ensures that College staff contribute to assessments of need and support plans for those pupils. Staff can quickly and easily inform the DSL of any lower level concerns. Vulnerable Pupils will be discussed on a weekly basis with key staff and appropriate support plans put in place. Any pupils who are deemed to be at high risk of harm are risk assessed in accordance with the College's risk assessment policy to afford extra support and safety measures.

4.11 The role of the DSL in assisting the governors to monitor the effectiveness of the child protection policy and systems is set out at paragraph 19 below.

5. All Staff Members are Expected to:

- Adopt a child-centred approach at all times – this means that they should at all times consider what is in the best interests of the child;
- Maintain an attitude that 'it could happen here' where safeguarding is concerned;
- Be familiar with, and understand, the content of this policy and the types and signs of abuse and neglect identified in section 10 below and in the Appendices, so that they are able to identify pupils who are in need of help or protection. It is essential that staff act on and refer at the earliest signs of abuse and neglect;
- Be aware of the systems within the College to support safeguarding including the response to pupils who go missing from education;
- Attend their induction where safeguarding and child protection procedures will be explained;
- Know the names of the DSL and where to find the a list of members of the team;
- Understand the basic principles of information sharing where relevant and as appropriate;
- Attend regular appropriate training and undertake relevant training as required– updates are provided at least annually – please see paragraph 18;
- Read and understand at least the updated Part 1 of the statutory guidance 'Keeping Pupils Safe in Education', DfE, each year and the College's mandatory safeguarding policies (including missing pupils), the staff code of conduct and behaviour policies. This is provided as part of the induction process, and is available either in hard copy form or on the staff intranet;
- Be aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put pupils in danger;
- Uphold the premise that the College will not tolerate sexual violence or sexual harassment, nor dismiss it simply as "banter", "just having a laugh" or "part of growing up".

6. Information Sharing

6.1 Everyone who comes into contact with pupils and their families has a role to play in safeguarding pupils. College staff are particularly important as they are in a position to identify concerns early, and provide help for pupils to prevent concerns from escalating. The College and its staff form part of the wider safeguarding system of pupils detailed in the statutory guidance Working Together to Safeguard Pupils, 2018.

6.2 Care will be taken to ensure that information concerning child protection is given only to the appropriate people on a “need to know” basis. All staff must be aware of issues relating to confidentiality and the status of information they may hold.

6.3 The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping pupils safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of pupils. If in doubt about sharing information, staff should speak to the DSL.

6.4 All staff must be aware of the seven golden rules of information sharing which can be found in the Appendices.

6.5 The DSL will nevertheless take a lead role in determining whether information should be shared on a case-by case basis using their professional judgement, supported by other agencies such as pupils’s social care.

6.6 In cases where there are allegations of either sexual violence or sexual harassment between pupils, the DFE guidance will be followed by the DSL to determine the appropriate course of action be it:

- Internal management;
- Early Help;
- Referral to pupils’s social care;
- Reporting to the police.

6.7 Parental consent is not required to contact and liaise with social care or other external agencies. It is however the usual practice for the DSL to inform parents, unless this would put the child at risk of suffering further harm or would jeopardise a police investigation. Advice will be taken from appropriate agencies at the time – please refer to the Appendices for contact details.

6.8 If there are concerns about pupils who are not formally enrolled as Saint Peter’s pupils but attend a holiday or sports or other club and these concerns do not meet the threshold for reporting, the College will, in consultation with the DSL, consider whether if it is appropriate for safeguarding reasons to share the concerns with the pupil’s usual College or other agency, and parents where appropriate.

7. Early Help

7.1 In cases of pupils who have not suffered harm, but are in need of additional support, appropriate referrals will be made. Any child may benefit from early help but all staff should be particularly alert to the potential need for early help for any child who:

- is disabled and has specific additional needs;
- has special educational needs;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- is misusing drugs or alcohol themselves;
- is a privately fostered child.

7.2 The aim of Early Help is to provide support as soon as a problem emerges at any time during a child's life and to work with parents with their consent.

8. Where Pupils are at Risk

8.1 If, at any point, there is a risk of serious harm to a child, a referral should be made immediately. Any member of staff may do this and, if the child's situation does not appear to be improving, the staff member must press for re-consideration to ensure that the concerns lead to help for the child.

8.2 As soon as there is an allegation of abuse, there should be no further investigation of the incident prior to immediate consultation within the appropriate statutory agencies – normally social care and the police.

8.3 Direct referrals should be reported to the DSL as soon as possible thereafter, unless the referral relates to an allegation against the DSL in which case it should be referred to the Executive Head Master, or in his absence the Chair of Governors.

8.4 The statutory guidance "Working Together" states, *"Once the referral has been accepted by local authority pupils's social care, the lead professional role falls to a social worker. The social worker should clarify with the referrer, when known, the nature of the concerns and how and why they have arisen. Within one working day of a referral being received, a local authority social worker should make a decision about the type of response that is required"*.

This will include determining whether:

- The child requires immediate protection and urgent action is required;
- There is reasonable cause to suspect that the child is suffering, or likely to suffer, significant harm, and whether enquiries must be made;
- Any services are required by the child and family and what type of services.

9. Working with Other Agencies

9.1 College staff may be called upon to participate in meetings organised by the French government. These might be in relation to:

- Strategy discussions;
- Child protection reviews and conferences;

- Family group conferences for pupils in need or in a range of circumstances where a plan is required for the child's future welfare;
- Professionals' meetings in which representative professionals from different agencies are asked to meet to discuss pupils and their families with a view to providing support or making recommendations in terms of next stages of involvement;
- Core group meetings in which professionals are asked to meet to review progress and actions.

9.2 At any such meetings, staff should be ready and prepared to report providing information about:

- The child's attendance and punctuality;
- The child's behaviour and attitude;
- The child's relationships with their peer group and social skills generally;
- The child's academic achievement;
- Contact with parents or carers;
- Any specific incidents that need reporting.

9.3 Prior to a meeting, class teachers and other adults working closely with the child should be asked for their comments. Following the meeting, feedback should be given and staff brought up to date with any actions that are needed, provided due regard to confidentiality is maintained.

9.4 The College may be asked to provide statements pursuant to requests from relevant agencies and provide a witness/witnesses to attend court in some cases.

9.5 In the event that social care wish to meet with a child to discuss any allegation, the College will provide an appropriate venue.

9.6 In the case of pupils who are seen to be at risk of radicalisation, discussion will need to take place with the referring teacher (s) / staff members and the DSL, and other staff as appropriate, as to the most appropriate body to which a referral may be made.

10. When a Child Discloses an Allegation of Possible Abuse

10.1 Dealing with allegations of possible abuse appropriately is crucial in terms of ensuring that an accurate assessment can be subsequently carried out by the statutory agencies where appropriate and that appropriate child measures can be taken.

10.2 All identity cards which are issued to staff have an aide memoire printed on the back, advising how to deal with receiving information that amounts to an allegation - which could happen at any time. If a child discusses anything that could indicate the possibility of abuse, the person receiving such information should follow the procedure below.

10.3 Remember that a child might offer information about their own experiences or information about a friend (which could turn out to be the child him/herself).

10.4 Procedure for dealing with an allegation of abuse made by a child:

- Listen carefully to the child, be non-judgemental, remain calm and offer reassurance and support;
- Reassure the child that they are doing the right thing and that you recognise how hard it must be for them. The child must not feel that they are creating a problem or feel ashamed;
- Accept what the child has to say without challenge;
- DO NOT promise confidentiality, but let the child know that only those who need to know will be informed and that they will be people who have to know in order to help them;
- Listen, but do not investigate or ask leading questions. Do not ask further questions as soon as the child has disclosed that he or she believes that something abusive has happened to him or someone else;
- Observe bruises or other signs of injury, but do not ask the child to remove or adjust clothing to investigate further;
- Do not lay blame or criticise the child or the perpetrator. Be non-judgemental;
- Time should be taken to reassure the child and confirm at the conclusion of the conversation that information will be treated seriously and sensitively;
- Ask the informing child what steps they would like taken to protect them now that they have made an allegation and advise that whilst the College will try to follow their wishes there can be no guarantee of confidentiality if it is necessary to inform statutory agencies for example if they or another child are (at risk of) suffering significant harm etc.

10.5. Procedures for monitoring, recording and reporting:

10.5.1 At the time, or as soon as possible, a detailed record should be written about the allegation including:

- The name(s) of the child(ren) making the allegations, and the names of any others mentioned;
- The time and date of the conversation;
- The place and context of the disclosure;
- A detailed account of the conversation, circumstances and any other relevant factors. This should be factual and not contain any assumptions or interpretation. The child's own language should be quoted, rather than translating into own terms. Be aware that this report may be used at a later date to support a referral to an external agency;
- The name of the person reporting the disclosure, the date and signature.
- If making notes during any disclosure, staff must be very conscious of the need to remain engaged with the child and not appear distracted by the note-taking;
- If at all possible, disclosures should be managed with two members of staff present.

10.5.2 Any original notes (include jottings) of the original disclosure, text messages and any potential material which could become evidence in any subsequent

investigation must be retained and given to the DSL or Executive Head Master for safe storage.

10.5.3 If injuries such as bruises have been observed these should be marked on a body map which is available from the DSL.

10.5.4 It is not the staff member's role to investigate the allegation – rather to listen to the child, record the information accurately and pass it on immediately.

10.5.5 Staff should not assume that someone else is dealing with the alleged incident and should report it, if in doubt.

10.5.6 This should be given to the DSL as soon as possible. The DSL will then follow the procedure outlined above in terms of liaising with social care.

11. Dealing with Allegations of Peer Abuse

11.1 All staff should be aware that pupils can abuse other pupils (peer on peer abuse). This is most likely to include, but may not be limited to the following, which in some cases will or may constitute criminal offences:

- Bullying (including cyber- bullying);
- Physical abuse such as hitting, kicking, biting, hair pulling;
- Sexual violence;
- Sexual harassment such as sexual comments, remarks, jokes, unwanted touching, and online sexual harassment which may be stand-alone or part of a broader pattern of abuse;
- Sexting (youth produced sexual imagery);
- Initiation / hazing type violence and rituals.

11.2 A pupil against whom an allegation of abuse has been made may be suspended from the College during the investigation and the College's policy on behaviour, discipline and sanctions will apply in the form of the anti-bullying policy.

11.3 The College will take advice from pupils's social care on the investigation of such allegations, and will take all appropriate action to ensure the safety and welfare of all pupils involved, including the pupil or pupils accused of abuse.

11.4 If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the College will ensure that, subject to the advice of pupils's social care and the police, parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult. In the case of pupils whose parents are living abroad and cannot attend the College at very short notice, the pupil's educational guardian will be requested to provide support to the pupil and to accommodate him if it is necessary to suspend him or her during the investigation.

11.5 Where an allegation has been made against a pupil, all of those involved, including witnesses, will be treated as being at risk of significant harm. It is recognised that those with special educational needs are at particular risk of peer abuse and teachers are alert to this.

11.6 A bullying concern will be treated as a child protection concern when there is reasonable cause to believe that a child is suffering or likely to suffer significant harm which may warrant referral to an external agency. A risk-based approach will be adopted where there are concerns of an ongoing risk of significant harm; for example, a risk assessment (with the benefit of the advice of statutory authorities, where appropriate) must be carried out with a view to ensuring the safety of all pupils and that all pupils involved, including witnesses, receive appropriate support.

11.7 The College's anti-bullying policy gives extensive guidance to staff and pupils, and details how pupils who have been bullied will be supported.

11.8 Responses to the alleged behaviour will be considered on a case-by-case basis and will take into account the circumstances of all of those pupils concerned. It is understood that harmful behaviour can progress on a continuum and that addressing inappropriate behaviour can be an important intervention in preventing future harm. Pupils who abuse may themselves have suffered abuse and an assessment of the child shall take into account wider environmental factors which threaten their safety or welfare. The DSL and his team will take such matters into account when considering the appropriate approach.

11.9 It is acknowledged that sexual violence and harassment may be driven by wider societal factors such as stereotypes and sexist language. The DSL will consider the context of any abuse (contextual safeguarding). The College works hard to challenge such behaviours through its curriculum and extra-curricular activities and to promote mutual respect. The College will not dismiss certain behaviour simply as "banter", "just having a laugh" or "part of growing up". Unwanted touching and associated behaviours are not tolerated.

11.10 The College will liaise with the respective parents appropriately considering what information should be provided about any other child, taking into account the views of other agencies. Any measures taken to protect a child will be discussed with their parents unless the law or external agencies dictate otherwise.

12. Dealing with Allegations of Abuse against Staff, Volunteers and the Head Master

12.1 The College has procedures for dealing with allegations against staff that aim to strike a balance between the need to protect pupils from abuse, and the need to protect staff from false or unfounded allegations. These procedures will be used where the member of staff has been alleged to (or may) have:

- 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; or
- Behaved towards a child or pupils in a way that indicates he or she would pose a risk of harm if he or she worked regularly or closely with pupils.

12.2 If an allegation is made against a member of staff, the matter will be dealt with by the DSL or the Chair of Governors who will oversee the process as the 'Case Manager', and will keep the Executive Head Master informed.

12.3 Where an allegation or complaint is made against the DSL, the matter should be reported immediately to the Executive Head Master, or in his absence the Chair of Governors.

12.4 Where an allegation or complaint is made against the Executive Head Master, the person receiving the allegation should immediately inform the Chair of Governors or in their absence the Deputy Chair, without first notifying the Executive Head Master.

12.5 If an allegation is made against the Chair of Governors, the allegation shall be reported to the Executive Head Master. Where appropriate, the Executive Head Master will consult with the DSL.

12.6 All allegations that come to the College's attention, including those discussed directly with the police, will be discussed within one working day. It will be more usual practice to discuss any course of action, including referral to the police, with the Chair of Governors prior to embarking on any course of action.

12.7 Allegations against a member of staff who is no longer employed by the College will be referred to the police along with allegations that may amount to a criminal offence.

12.8 No member of staff may investigate an allegation of abuse made against themselves.

12.9 The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern. In this situation, the decision and a justification for it should be recorded and agreement reached on what information should be put in writing to the individual concerned and by whom. The Case Manager should then consider what action should follow both in respect of the individual and those who made the initial allegation.

12.10 If there is cause to suspect a child is suffering or is likely to suffer significant harm, a strategy discussion should be convened. If the allegation concerns physical contact, the strategy discussion or initial evaluation with the police should take into account that teachers and other College staff are entitled to use reasonable force to control or restrain pupils in certain circumstances, including dealing with disruptive behaviour.

12.11 The Case Manager will usually inform the accused person of the allegation as soon as possible after the DSL has been consulted, unless it would place a child at further risk of significant harm or jeopardise a police investigation. The parents or carers of the pupil(s) involved will be informed of the allegation as soon as possible if they do not already know of it.

12.12 Support for Staff - The College has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. The procedures for dealing with allegations need to be applied with common sense and judgement. Individuals should be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless external agencies object to this. A representative will be appointed by the Case Manager to keep them informed of the progress of the case and to consider what other support is available for the individual, as appropriate. Social contact with colleagues and friends should not be prevented, unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

12.13 Action Against the Accused

12.13.1 The following definitions should be used when determining the outcome of allegation investigations:

- **Substantiated:** there is sufficient evidence to prove the allegation;
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- **False:** there is sufficient evidence to disprove the allegation;
- **Unsubstantiated:** there is insufficient evidence to either to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence;
- **Unfounded:** there is no evidence or proper basis which supports the allegation being made and there may be evidence which supports the account of the staff member (for example, an allegation that a teacher was in a certain place in a certain time, and there is evidence to show that the teacher was in fact elsewhere).

12.13.2 Where an investigation by the police or the local authority, the DSL will discuss the steps to be taken with the Case Manager. The appropriate action will depend on the nature and circumstances of the allegation and will range from taking no further action to summary dismissal, or a decision not to use the person's services in the future.

12.13.3 It may be necessary to undertake a further investigation to determine the appropriate action. If so, the DSL will discuss with the Executive Head Master or Chair of Governors as appropriate, as to how and by whom the investigation will be undertaken.

12.13.4 If an allegation is made against a member of resident staff, consideration will be given as to whether the member of staff should be asked to move off site, the cost of this may need to be funded by the staff member concerned depending on the circumstances of the case.

12.13.5 In the event of a child protection allegation against a member of staff, the timing of the process outlined above will take precedence over the disciplinary policy. However, the provisions of the disciplinary process may be invoked irrespective of whether the child protection concern is substantiated (for example the staff member's conduct may not have amounted to a child protection concern, however it may fall short of the standard required).

12.13.6 If there has been a substantiated allegation against a member of staff, the DSL will work with the case manager to determine whether there are any improvements to either policy or practice which would prevent the recurrence of a similar matter. This includes issues arising from the decision to suspend the staff member, the duration of the suspension and whether or not suspension was justified.

12.14 Suspension

12.14.1 Suspension must not be an automatic response to an allegation and all options to avoid suspension should be considered prior to taking that step. Suspension will only be considered in a case where:

- There is cause to suspect pupil (s) at the College is, or are at risk of significant harm; or
- The allegation is so serious that it might be grounds for dismissal.

12.14.2 The professional reputational damage that can arise from suspension where an allegation is later found to be unsubstantiated, unfounded, false or malicious must be considered. Alternative arrangements to suspension must be considered, for example, redeployment. If there is no reasonable alternative to suspension and suspension is deemed appropriate, the reasons and justification for this will be recorded and the individual notified of the reasons.

12.14.3 Where it has been deemed appropriate to suspend the person, written confirmation will be dispatched within one working day, giving as much detail as appropriate for the reasons for the suspension. The person will be informed at the point of their suspension who their named contact is within the organisation and provided with their contact details. They will be regularly updated as to the progress of the investigation unless it would prejudice the investigation process, and any work-related issues. Options for additional support will be discussed.

12.15 Sharing Information with Parents

12.15.1 Parents or carers of a child or pupils involved shall be told about the allegation as soon as possible if they do not already know of it. However, where a strategy discussion is required, or police or pupils's social care services need to be involved, the Case Manager shall not do so until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers. Parents or carers should also be kept informed about the progress of the case, and told the outcome where there a criminal prosecution does not ensue, including the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed, but the parents or carers of the child should be told the outcome in confidence.

12.15.2 Parents and carers shall also be made aware of the prohibition on reporting or publishing allegations about teachers. If parents or carers wish to apply to the court to have reporting restrictions removed, they will be told to seek legal advice.

12.16 Criminal Proceedings

12.16.1 The College will consult with the Chair of Governors following the conclusion of a criminal investigation or prosecution as to whether any further action, including disciplinary action, is appropriate and if so, how to proceed. The options will depend on the circumstances of the case, including the result of the police investigation or trial and the standards of proof applicable.

12.17 Return to Work

12.17.1 If it is decided that the person who has been suspended can return to work, the College shall consider how to facilitate this. For example, a phased return may be appropriate and / or the provision of a mentor to provide assistance in the short term. The College shall also consider how to manage their contact with the pupil(s) who made the allegation.

12.18 Ceasing to Use Staff

12.18.1 If the College ceases to use the services of a member of staff (or a governor or volunteer) because they are unsuitable to work with pupils, there will be a prompt and detailed report to the appropriate agency.

12.18.2 The College has a legal duty to refer promptly to the local authority any person (including a pupil):

- who has harmed, or poses a risk of harm to a child, or
- if there is reason to believe a member of staff has committed one of a number of listed offences,
- and/or if they have been removed from working (paid or unpaid) in Regulated Activity, or would have been removed had they not left.

12.18.3 A compromise agreement will not be used to prevent a referral to the local authorities, nor can an individual's lack of co-operation. The College will also notify the police promptly if a crime has been committed or is suspected.

12.18.4 The College will notify the training agency in the case of trainee teachers or other personnel undertaking training at the College.

12.18.5 The Governing Body and Senior Leadership Team of Saint Peter's International College recognise the requirement to report any serious incidents, such as suspicions, allegations or incidents of abuse.

12.18.6 Any such incidents will be followed by a review of the safeguarding procedures within the College, with a report being presented to the Governing Body without delay.

12.18.7 Contact details for the above agencies are detailed in the Appendices.

12.19 Resignation

12.19.1 If a member of staff (or a governor or volunteer) tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by the College. Resignation will not prevent a prompt and detailed report being made in appropriate circumstances. Compromise agreements will not be used in such circumstances, and the providing references policy will be adhered to.

12.20 Timescales

12.20.1 All allegations must be dealt with as a priority to avoid any delay. Where it is immediately clear that the allegation is unfounded, false, or malicious, the case

should be resolved within one week. It is expected that most cases of allegations of abuse against staff will be resolved within one month with exceptional cases being completed within 12 months. If the nature of the allegation does not require formal disciplinary action, the Executive Head Master should institute appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, it should be held within 15 working days in term time.

12.21 Confidentiality

12.21.1 The College will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

12.21.2 The Case Manager will take advice from the DSL, police and pupils's social care services to agree the following:

- Who needs to know and, importantly, exactly what information can be shared;
- How to manage speculation, leaks and gossip;
- What, if any information can be reasonably given to the wider community to reduce speculation; and
- How to manage press interest if and when it should arise.

12.22 Existing Staff

12.22.1 If the College has concerns about an existing staff member's suitability to work with pupils, all relevant checks may be made as if the person were a new member of staff.

12.22.2 All staff are required to notify the College immediately if there are any reasons why they should not be working with pupils - this will include notification of convictions, cautions, court orders, reprimands or warnings. This includes any staff member who has been disqualified from working with pupils.

12.22.3 The College will ask relevant staff members annually if there has been a change to the circumstances which would mean that they may be disqualified from working with pupils under this provision.

12.23 Providing references

12.23.1 Only line managers may provide a reference for a member of staff, and they must adhere to the providing references policy. Failure to do so is likely to constitute a disciplinary matter.

12.24 Malicious Allegations

12.24.1 Where an allegation by a pupil is shown to have been deliberately invented, malicious, or unfounded the Executive Head Master will consider whether to take disciplinary action in accordance with the College's behaviour and discipline policy.

12.24.2 Where a parent has made a malicious allegation the Executive Head Master will consider whether to require the withdrawal of the pupil from the College on the basis that they have treated the College or a member of staff unreasonably.

12.24.3 Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the College reserves the right to contact the police to determine whether any action might be appropriate.

12.24.4 Allegations that are not substantiated, are false, unfounded or malicious will not be referred to in employer references.

12.25 Support for a Pupil Making an Allegation

12.25.1 In cases where a child may have suffered significant harm, or there may be a criminal prosecution, pupils's social care services, or the police as appropriate, should consider what support the child or pupils involved may need.

12.25.2 Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, Colleges and colleges should be aware of anonymity, witness support and the criminal process so they can offer support and act appropriately. The College is particularly aware of the potential impact of social media in facilitating the spread of rumours and exposing the identity of someone who is understood to have suffered abuse.

12.25.3 An immediate risk assessment will be undertaken in accordance with the risk assessment policy to consider all of those involved. The risk assessment will not wait for the outcome of a police investigation but may be informed by it subsequently.

12.26 Record Keeping

12.26.1 Details of allegations that are found to have been false or malicious should be removed from personnel records, but will be retained as part of a separate safeguarding record. They will not be referred to in any reference. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned. The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation resurfaces after a period of time.

13. Missing, Lost and Uncollected Pupils

13.1 If a child goes missing from College or a boarding house, staff shall follow the College's procedures and be vigilant for signs that this might indicate abuse or neglect, and consider whether this may suggest inclusion of the child on the College's vulnerable pupils register or referral to any statutory agency.

13.2 Longer term and repeated absences from College are monitored by a pupil's House Master tutor and staff are aware of the need for vigilance. In each case the DSL will be informed when a pupil is absent for more than 10 consecutive days and contact will be made with the parents. The College will inform the local authorities where a pupil's name is to be deleted from the admission register on certain grounds – for example where the family proposes to home College the child, has apparently moved away, has been certified as unfit to attend College, or where the child has been permanently excluded. In addition, the College will notify the local authorities when they remove or add a pupil's name to the admissions register at nonstandard transitions (for example where a pupil of compulsory College age leaves prior to completion of the College's final year or joins the College after the beginning of the first year). This duty applies within 5 days of a pupil's name being added to the register, or as soon as the grounds are met when a pupil's name is to be deleted from the register. The College will work co-operatively with the local authorities to undertake reasonable inquiries.

13.3 Staff will notify the Pupils's Social Care Team immediately if there is an unexplained absence of any pupil who is subject to child protection procedures, or an absence which has been explained, but where the College is concerned.

13.4 When a child is not collected within expected timescales, the College will investigate.

14. The College's Staff Code of Conduct

14.1 The College's Staff/Pupil Code is a very significant policy as it sets out clear guidelines for staff which safeguard both pupils' welfare, and staff from putting themselves in vulnerable situations when allegations can be made, for example, in one-to-one tuition, sports coaching, conveying a pupil by car, engaging in inappropriate electronic communication with a pupil, and so on.

14.2 All staff are required to read the code of conduct annually, be familiar with it and adopt it. It is available in the Staff handbook and all staff are required to confirm that they have read and understood the policy on an annual basis. It is also available in hard copy form free of charge.

15. Whistleblowing Procedures

15.1 All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the College's safeguarding regime. All concerns are taken seriously by the Senior Leadership Team.

15.2 In the event that a staff member is concerned about poor or unsafe practices in the safeguarding regime, and they do not feel that raising the matter with the DSL would be

either effective or appropriate, they may approach the Executive Head Master or the Chair of Governors about the issue. Staff should be aware that they may make a referral direct to social care about the safety of any child / pupils. The protections of the whistleblowing policy apply.

16. The College's Recruitment Procedures

16.1 The College has a culture of safe recruitment and, as part of that, has adopted recruitment procedures that help to deter, reject or identify people who might abuse pupils.

16.2 Please refer to the separate policies in respect of recruitment of staff, governors, and volunteers.

17. Supervision of Visitors and Contractors

17.1 Visitors (including visiting speakers) will be admitted only by signing in and out of the College and will remain supervised by a member of staff at all times.

17.2 Contractors coming on site will have their identity checked, be risk assessed, have the appropriate checks undertaken and be appropriately supervised.

18. The Training of the DSL Staff, Volunteers and the Executive Head Master

18.1 The College will continue to:

- Provide the DSL with the time, funding, training, resources and support to enable her to support other staff on safeguarding matters. The DSL will regularly attend courses with child support agencies to ensure that they remain conversant with best practice.
- Ensure that the DSL and the Executive Head Master undertake two-day multi-agency training recommended by the Governors;
- Ensure that there is always a nominated Governor with responsibility for safeguarding who meets at least once a term with the DSL and who has undergone appropriate training every two years;
- All existing staff will receive training regarding any updates to child protection legislation and practice as required and at least annually. Informal updates (for example staff briefings and emails) will be provided as required;
- Every new member of staff, including part-timers working in the College, receives appropriate training on their responsibilities in being alert to the signs of abuse, bullying, sexting and on the procedures for recording and referring any concerns. Training in child protection is an important part of the induction process. Training includes a review of the College's child protection policy including the whistleblowing policy, staff pupil code (the staff behaviour policy), awareness training to equip staff to identify pupils at risk of being drawn into terrorism, the behaviour policy, procedure for missing pupils and the identity of the DSL.

19. Other Safeguarding and Welfare Responsibilities

19.1 Raising Awareness - the College will continue to raise awareness of child protection issues by:

- Ensuring that every member of staff knows the name of the DSL responsible for child protection and their role;
- Ensuring that parents have an understanding of the responsibility placed on the College and staff for safeguarding and child protection by setting out its obligations on the College website;
- Contributing to the wider safeguarding agenda by working with the local community and following government guidance to help pupils live and work in a safe environment;
- Ensuring that other policies which contribute towards safeguarding pupils and young people are reviewed and updated regularly and appropriate advice sought;
- Staff are given the opportunity to contribute to and shape the child protection policies;
- Ensuring that lessons are learned if appropriate from any incidents where allegations are substantiated or improvements to procedures deemed justified;
- Ensuring that the DSL reports regularly to the Board of Governors on child protection matters and the effective implementation of policy and procedure.

20. Equipping all Pupils with the Skills Needed

20.1 The College recognises that because of the day to day contact with pupils, staff in Colleges are well placed to observe the outward signs of abuse and that all staff, volunteers and Governors have a full and active part to play in protecting our pupils from harm.

20.2 The College will therefore:

- Ensure that pupils know that there are adults in the College who they can approach if they are worried and in whom they can confide;
- Clearly show the names of the DSL with a statement explaining the College's role in referring and monitoring cases of suspected abuse;
- Take care in regard to the discussion of sensitive issues – seeking advice where there are concerns. Within the curriculum there will also be opportunities to discuss issues which some pupils might find sensitive and/or disturbing

20.3 Support in College - Boarding

20.3.1 All matters in this policy apply equally to boarding pupils at all times that they are pupils.

20.3.2 This policy is consistent with the requirements for boarding Colleges.

20.3.3 Specific guidance about whom boarders can contact if something is making them unhappy is published on posters in the College.

20.3.4 Staff involved in boarding houses and those who have greater access to pupils in the College are subject to the additional checks. The College has a risk assessment policy and Health and Safety Policy.

20.3.5 The College will ensure that the pupils are aware of the independent listeners and how to contact them with posters placed at prominent places including by phones in the College.

20.3.6 Office holders, including resident staff are briefed on the contents of this policy with emphasis on their responsibility towards safeguarding peers and younger pupils, recognising forms of abuse, dealing with disclosures and reporting;

20.3.7 A written agreement will be made between the College and any person over 16 (not employed by the College but living in the same premises as boarders e.g. members of the staff households) covers matters such as:

- The terms of their accommodation;
- Guidance on contact with boarders;
- Their responsibility to supervise their visitors;
- Advice that their accommodation may be withdrawn if evidence comes to light about any unsuitability to have contact with pupils;
- The requirement to notify an unrelated designated senior member of staff if they are charged with, or convicted of, any criminal offence.

20.4 Supporting Pupils

20.4.1 The College will:

- Recognise that a child who is abused or harmed, sexually or otherwise who witnesses violence or who lives in an abusive or violent environment may feel helpless and humiliated, may blame himself, and find it difficult to develop and maintain a sense of self-worth. Such pupils may struggle to maintain a full-time table and may express a wish to withdraw from some lessons and activities. Where this assists them to manage a situation, the College will facilitate this as far as is reasonable;
- Further recognise that the College may provide the only stability in the lives of pupils who have been abused or who are at risk of harm;
- Accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn;
- Ensure that pupils who have been abused are particularly closely monitored and supported and any concerns are recorded and reported to Social Care. Support may be necessary to protect and support pupils for a long time. Regardless of whether the police take action, the College will continue to support any child who feels that they have suffered abuse;
- Do all that is reasonable to protect pupils from bullying and harassment as a result of making a report;

- Implement a Personal Education Plan for all Pupils in Care and a Pastoral Support Plan or Individual Education Plan for other pupils where there is a need for specific support;
- Provide continuing support to a child (about whom there have been concerns) who leaves the College by ensuring that such concerns and College medical records are forwarded under secure confidential cover to the DSL at the pupil's new College as a matter of urgency, and in any event within 10 working days;
- Establish a safe environment in which all pupils feel safe, secure, valued and respected, feel confident and know how to approach adults if they are in difficulties or feel threatened;
- Support each child's development in ways that will foster security, confidence and resilience and help develop effective working relationships with all other agencies involved in safeguarding pupils;
- Liaise with social care to provide information where required, attend such meetings as requested and support any child protection plan;
- Consider supporting the pupils concerned through the vulnerable pupils' register. In addition to the appropriate sanction, if any, consider, in all the circumstances, what support should be offered to any pupil who is alleged to have been responsible for harmful behaviour.

21. Monitoring and Evaluation of this Policy

21.1 The College and its governors monitor and evaluate the effectiveness of this safeguarding and child protection policy and procedures through the following activities:

- Governor visits to the College;
- Frequent scrutinising of attendance data;
- Regular analysis of a range of risk assessments;
- Scrutiny of termly report in Board meetings;
- Logs of bullying / racist behaviour incidents are reviewed regularly by the senior leadership team and the governing body;
- Regular review of parental concerns.

21.2 Board Meetings

21.2.1 As part of the College's commitment to establishing a safe environment for pupils, the Governing body will receive a termly update from the Designated Governor responsible for Safeguarding confirming that they have made a detailed check on staff files to ensure that the College is adhering to the Recruitment, Selection and Disclosure Policy and Procedure and that checks on risk assessments for contractors have been made.

21.2.2 The Designated Safeguarding Lead will also give a termly report on the following:

- Details of any safeguarding or child protection matters that have arisen. A review of how the duties of all persons were discharged in relation to safeguarding matters and a review of any incidents from which lessons may be

learned to include any referrals made for help and support for individual pupils and details of how the College may be supporting that child in partnership with other agencies;

- Any significant changes to this or related policies that have been made;
- Review of logs relating to bullying / racist incidents, and any other complaints relevant to child protection;
- Training updates for staff (new and existing) and governors;
- Detail of any visits made by governing body members to the College with relevance to child protection concerns (if appropriate);
- A review of attendance data with particular reference to any particular concern with regard to any pupils (anonymised names) who are regularly going missing, and how this is being addressed;
- Details of planned review of any incidents from which lessons may be learned;
- Any other information pertinent to child protection issues at the College (for example the impact of any new guidance, legislation, regulations, any changes in procedure;
- The impact of any planned changes on the College from the perspective of child protection;
- Any new strategies or planned changes in the forthcoming term – relevant to child protection.

21.3 The arrangements for reviewing the College's child protection policies and procedures annually:

21.3.1 In addition to the matters outlined at para 20.2 above, the Board of Governors will annually:

- Receive a report from the designated governor for safeguarding which summarises the checks for the year by way of an overview;
- Receive a report on training in safeguarding and child protection for staff to ensure that all staff and designated persons have received the appropriate training within the timescales set;
- Receive a report on any safer recruitment training undertaken;
- Review the policies which fall within those designated to form part of the Annual Safeguarding Review. This will comprise the Child Protection Policy and those policies which form part of it (including but not limited to the staff pupil code, the whistleblowing policy, recruitment policies for staff, governors and volunteers, and the anti-bullying policy).

21.3.2 If revised legislation, regulation or statutory guidance require a need for amendment to this policy, this will be effected as soon as possible and ratified by the Chair of Governors and Governor responsible for Safeguarding. Any proposed substantive changes (as determined by them) will be ratified by the Board at the next available meeting. Any incident that dictates a change to this policy will likewise trigger an immediate review.

Appendix 1

Types, Definitions and Signs of Abuse and Neglect Abuse neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another. The following provides a list of some of the common signs of abuse.

They may not all be present and the list is not exhaustive. Abuse may not be confined to one particular type. Knowing what to look for is vital to the early identification of abuse and neglect. If staff are unsure they should always speak to the DSL.

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. Pupils may be abused in a family or in an institutional or community setting by those known to them, or more rarely by others (eg via the internet). They may be abused by an adult or adults or another child or pupils.

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.

Potential Signs of physical abuse:

- Unexplained injuries or burns;
- Improbable explanations of injuries;
- Admission of punishment which appears excessive;
- Fear of returning home or parents being contacted;
- Fear of medical help;
- Over compliant behaviour;
- Significant changes in behaviour;
- Unexplained pattern of absences;
- Refusal to discuss injuries;
- Untreated injuries or lingering illness;
- Shrinking from physical contact;
- Fear of undressing;
- Aggression / bullying;
- Running away;
- Deterioration in work.

Physical abuse also occurs if the parent or carer fabricates or induces an illness in the 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 pupils. 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 pupils frequently to feel frightened or in danger, or the exploitation or corruption of pupils. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Potential Signs of emotional abuse:

- Continual self-deprecation;
- Inappropriate emotional responses to painful situations;
- Compulsive stealing / scrounging;
- Air of detachment ‘don’t care’ attitude;
- Eating problems;
- Depression, withdrawal or ‘neurotic’ behaviour;
- Fear of new situations;
- Self-harm or mutilation;
- Drug / solvent abuse;
- Social isolation;
- Attention seeking behaviour.

Sexual abuse:

- A child under the age of 13 can never consent to any sexual activity;
- In the law, sexual intercourse without consent constitutes rape as does intentionally penetrating the anus or mouth of another person with his penis;
- Assault by penetration occurs if an object is used;
- Creating and sharing sexual photos and videos of pupils under 18 is illegal;
- All staff are strictly forbidden from entering into an intimate relationship, with any pupil at this College, even those over the age of 18.

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 rape, sexual assault and assault by penetration, or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving pupils in looking at, or in the production of, sexual images, watching sexual activities, encouraging pupils to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

Sexual harassment is “unwanted contact of a sexual nature which may occur both online and offline.” It may include sexual comments and jokes, taunting, physical behaviour such as deliberately brushing against someone, displaying photos or drawings, and online sexual harassment which may include the sharing of sexual material on social media, and threats. Sexual harassment may create an atmosphere that can normalise behaviours, and provide an environment that could lead to sexual violence.

Sexual abuse and harassment is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other pupils.

Consent involves an individual having the freedom and capacity to choose. This encompasses the freedom to consent to a particular type of sexual contact but not to others.

Sexting relates to the sending or receiving of sexually explicit text, taking of indecent images, permitting such images to be taken or distributing or publishing such images – for example on social media. It is important to note that if the person taking the image or having the image taken is under 18 an offence is committed by both parties. Indecent images may include not only naked images, topless images of girls, but also images in underwear and sex acts.

Potential Signs of Sexual Abuse:

- Bruises, scratches, burns or marks;
- Sexual awareness inappropriate to the child's age;
- Attempts to teach other pupils about sexual activity;
- Aggressiveness, anger, anxiety, tearfulness;
- Scratches abrasions or persistent infection in the anal or genital areas;
- Frequent public masturbation;
- Withdrawal from friends;
- Refusing to stay with certain people or go to certain places.

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.

Potential signs of neglect:

- Constant hunger;
- Inappropriate clothing;
- Untreated medical problems;
- Poor social relationships;
- Constant tiredness;
- Poor personal hygiene;
- Frequent lateness or nonattendance;
- Low self-esteem;
- Compulsive stealing or scrounging.

Bullying: this can be defined as using deliberately hurtful behaviour, usually over a period of time, where it is difficult for those bullied to defend themselves. The four main types of bullying are:

- Physical;
- Verbal;
- Emotional; and
- Cyber.

All incidents of bullying should be dealt with by the class teacher in the first instance, followed by the House Master. Bullying of any form and abuse are closely linked issues. If a child discloses abuse by another pupil or pupils this must be dealt with in the same way as allegations or suspicions of abuse detailed in this policy.

All staff should be aware of indicators which may signal that pupils are at risk from, or are involved with serious violent crime. These may include increased absence from College, 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.

Appendix 2

The Essential Rules to Sharing Information

1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from the DSL if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where pupils or others may be at risk of harm. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear about the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.