



Child Protection & Safeguarding Policy

Action	Policy to be reviewed annually		
	Committee	Date	Completed
Reviewed	JEF	Jul 2018	✓
Reported	Safeguarding Steering	3 Sep 2018	
Reviewed	JEF	28 Sep 2018	
Reviewed	JEF	1 Nov 2018	
Approved	Board of Governors	Sep 2018	



Gresham's School

Child Protection and Safeguarding Policy

Senior, Prep, and Pre-Prep Schools

Children in our care are in trust. This places a burden of responsibility on all staff who care for them. It is the duty and responsibility of all involved in the care of young people at Gresham's School to recognise and exercise that trust in the light and practice of the legal framework ensuring that the best interests of the child are always paramount.

01. Child Protection: Policy Statement

- The welfare of children at Gresham's School is paramount.
- The Children's Act of 1989 and the Education Act of 2002 places a statutory responsibility upon schools to promote and safeguard every child's welfare and to have a written policy in place concerning abuse of any kind; it is the duty of all staff - both teaching and non-teaching - to play an active role in ensuring the safety and promoting the welfare of the children in the School's care.
- Should any deficiencies or weaknesses be discovered in the School's Child Protection arrangements, they will be remedied without delay.
- This policy applies to all staff and volunteers who work at Gresham's Schools, and to all support staff. It is available from the School website, and will be supplied to parents and pupils on request.
- The School's policy has due regard to Keeping Children Safe in Education (2018) and Working Together to Safeguard Children (2018).
- Our policy, in line with the Children Act 2004 Section 10, is to take all reasonable measures to improve the wellbeing of each child and young person (pupil) in our care.
- The Head Teachers, all staff, and volunteers in regulated activity will undertake child protection training which will be updated at least annually, in line with Norfolk Safeguarding Children Board advice, and including Prevent and online safety. This will include part-time and voluntary staff. Upper Sixth Form pupils are briefed on child protection and the appropriate action to take should they receive any allegations of abuse. This takes place at the beginning of the School year.
- Training for staff and induction training for new staff is detailed in Section 07.
- The Schools have procedures in place to deal with all allegations of abuse against staff, volunteers and the Head. Allegations against staff, Gap students or volunteers should be reported immediately to the Head or to Children's Services, but you must keep the Designated Safeguarding Lead informed. If the Head is absent, the allegation should be passed to the Deputy Head Pastoral, or the member of staff acting as Headmaster. If the allegation concerns the Head, the person receiving the allegation should immediately inform the Chair of Governors without notifying the Head first. If the allegation is against the DSL it should be reported to the Headmaster. In the case of serious harm, the police should be informed from the outset. This will always be in accordance with the statutory DfE guidance and Norfolk Safeguarding Children's Board Protocol 27, and in such matters the School will also inform and seek advice from the LADO. The Designated Safeguarding Leads are:

	Designated Safeguarding Lead	Deputy Safeguarding Leads
Senior School	Mrs Julie Flower	Mr Christopher Cox, Mr Will Chuter & Mr Tom Burnett
Prep School	Mrs Jemma Fenn	Mrs Katie Fields & Mr James Horsley
Pre-Prep School	Mrs Louise Down	Mrs Sarah Hollingsworth & Mrs Jemma Fenn

See also section 6.

- The Safeguarding Leads or a Deputy will always be available to staff for advice or support during term time. In the holiday period at least one Designated Lead or Deputy will always be available to staff; this is arranged by rota which is published to all staff.
- The Governor responsible for Child Protection is Dr Susan Rubin and she will review annually the School's Child Protection policies and procedures and the efficiency with which the related duties have been discharged. The DSL and the Governor responsible use the Norfolk Safeguarding Children Board's Self Review tool as part of this process. Dr Rubin can be contacted on 07771500740 or via the Clerk to the Governors, Mrs Victoria Hovenden on 07788264694.
- The Mrs Julie Flower, Designated Safeguarding Lead for the Senior School will make a full written annual report to the Governing Body, incorporating all three Schools. Written under Norfolk Safeguarding Children Board's guidelines it is presented in person to the Governing Body.
- It is the duty of the IT staff to ensure that internet access and electronic communication is as safe as possible. It is the responsibility of the ICT teaching staff to teach best safe practice in electronic communication. The Internet Safety Officer is Mr Will Chuter. Safeguarding includes Online Safety.

- Pupils will be made aware that when they are using 3G or 4G to access the internet from mobile phones, there will not be the same filters and protection in place when they are online.
- The Designated Safeguarding Leads and the Deputy Safeguarding Leads are the members of staff nominated to liaise with the Children's Services Department of the Local Authority over welfare matters.
- All young people under the age of 18 are subject to the Children Act 1989 and therefore Child Protection procedures apply to them.

02. Aims

- The School aims, in compliance with Section 10 of the Children Act 2004, to:
- Improve the physical and mental health and the emotional well-being of the young people in its care; to protect them from harm and neglect and to keep them safe from maltreatment.
- To provide pupils with relevant information, skills and attitudes to help them resist abuse and prepare for the responsibilities of adult life, including home and family.
- To allow staff to be familiar with, and confident of, the appropriate Child Protection procedures and issues. This policy is intended to give clear guidance to all staff, teaching and support staff, on signs that may indicate the possibility of abuse and the procedure to follow if a young person discloses or a member of staff suspects abuse.
- To monitor children who have been identified as 'at risk'.
- To support children who have been abused, in accordance with their agreed Child Protection plans.

03. Objectives

- Skills and information will be delivered through the curriculum and especially through the PSHE programme.
- All pupils have their own copy of the School Pastoral Care Booklet, which includes worries and complaints, online safety, bullying and Safeguarding information. This booklet is introduced and studied in tutor group sessions at the beginning of the School year.
- We try to create an environment and ethos in which young people feel secure and their points of view valued. They are encouraged to talk and they are listened to.
- We provide a range of appropriate adults whom they may approach if they are in difficulties.
- Staff will treat pupils with respect and pupils are expected to treat each other and staff with respect.
- We try to impress upon pupils the importance of rejecting violence as a means of resolving conflict.
- We give pupils opportunities to understand stress and strategies for coping with it.
- Sixth form pupils have access to our Wellbeing programme.
- We include in the curriculum information on personal safety.
- We operate clear policies on drugs, alcohol and substance misuse.
- We provide Child Protection training regularly to School staff, and at least annually. All staff undergo online Child Protection training (level 2) before commencing employment; this is updated every three years in addition to annual training. Information on Staff Code of Conduct and Whistleblowing Policy is delivered by the HR department. All staff have an induction session with the Designated Safeguarding Lead on the first day of work.
- Each member of staff must sign a specific form to say that they have read and understood the policy, as well as part one and Annex A of Keeping Children Safe in Education (KCSIE) September 2018, and accept their duty to cooperate with the School management in promoting Child Protection.
- We inform parents/guardians in the introductory guide that staff are required by law to follow the Norfolk Safeguarding Children Board procedures if they suspect that a pupil is a victim of abuse.
- There is a designated teacher (Mr Tim Hipperson, Senior School, and Mr James Quick, Prep and Pre-Prep School) with particular responsibility for the education of Looked After Children (LAC) and a list of LAC is regularly reviewed and updated.
- The DSL will ensure that that appropriate staff have the information required concerning the Child's legal status, as well as support for previously Looked After Children. The DSL will manage information concerning the child's care arrangement and local authority contact.
- Safety of our pupils offsite is covered in our Educational Trips and Visits Policies in the Staff Handbooks, Part 8 section 15 (Senior School, Taking Pupils Out of School), Part 8 (Prep and Pre-Prep School).

04. Recognising Child Abuse

- Abuse by one or more pupils against another pupil will usually be dealt with by the School's disciplinary framework in accordance with the School's Anti-Bullying policy. Bullying behaviour is damaging and may lead to abuse; there is also the possibility that relationships between students are abusive, and that perpetrator and victim may be at risk. Pupils and staff should be alert to these possibilities and bullying behaviour will be treated as a child protection concern where there is reasonable cause to suspect that a child is suffering or likely to suffer significant harm. This must be reported to the DSL
 - Where a pupil is at risk of significant harm, the DSL will contact Children's Services. The Police will be contacted at the earliest opportunity if the allegation indicates that a potential criminal offence has taken place.
 - Staff should also bear in mind that safeguarding issues can manifest themselves via peer on peer abuse. **Peer-on-peer abuse** is any form of physical, sexual, emotional or financial abuse, or coercive control, exercised between children and within children's relationships. This is most likely to include, but may not be limited to:
 - Bullying (including cyberbullying)
 - Physical abuse
 - Sexual violence and sexual harassment
 - Sexting (also known as youth-produced sexual imagery)
 - Initiation/hazing-type violence and rituals
 - Staff should be aware that some children are more vulnerable to peer-on-peer abuse, this includes children with SEN, children with disabilities and LGBT children
 - Peer-on peer abuse must be reported to the DSL the same as any other Safeguarding concern.
 - Support for both victim and perpetrator will be required in the event of peer-on peer abuse; key pastoral staff DSL, and DDSs will meet to make arrangements on an individual basis for reintegration to School with due regard to KCSIE (2018) advice, and with the specialist support, such as counselling, mental health practitioner support, or external specialist help as required.
- 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.
- Abuse can take place wholly online or technology may be used to facilitate offline abuse.
 - Behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put child at risk.
 - Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Staff must be alert to potential assumptions that indicators of possible abuse such as mood, behaviour and injury, relate to the child's disability without further exploration. Children with SEN can be disproportionately impacted by things like bullying without showing any outward signs. Children with SEN can also be more prone to peer group isolation, and extra pastoral support should be considered.
 - It is the duty of all staff to be vigilant and observant when dealing with pupils in their care and to have no hesitation in passing on concerns they may have regarding the physical and emotional well-being of any child in the School. The following lists, whilst not exhaustive, may be indicators that a child is suffering abuse. Staff should be aware of other signs they deem to be of concern.
 - Safeguarding is the responsibility of all staff, and no member of staff should **assume** that another member of staff will take responsibility for reporting or referral.

- Child abuse is when a child or young person is suffering or likely to suffer significant harm. A person may abuse or neglect a child/young person by inflicting harm or failing to act to prevent harm. There are four categories of child abuse in the Children Act. These are:
Physical Abuse, Neglect, Emotional Abuse and Sexual Abuse.
- Abuse is a form of maltreatment. A person may abuse a child by inflicting harm. Children and young people may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by a stranger, or for example, via the internet. They may be abused by an adult or adults, or another child or children.

Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child including by fabricating the symptoms of, or deliberately causing ill health to a child.

Signs and symptoms of physical abuse could include:

- Unexplained injuries or burns, bruises, finger marks
- Fear of undressing or medical help
- Improbable explanations for injuries
- Refusal to discuss injuries
- Untreated injuries
- Withdrawal from physical contact
- Self-destructive tendencies
- Fear of returning home or parents being contacted
- Unexplained absence from school
- Aggression towards others

Neglect

Neglect is a form of maltreatment. A person may neglect a child by failing to act to prevent harm. Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of the child/young person's health or development. Neglect may involve a parent failing to:

- Provide adequate food, clothing, shelter
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision
- Ensure access to appropriate medical care or treatment
- Respond to a child's basic emotional needs

Signs and symptoms of neglect could include:

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Poor state of clothing
- Emaciation
- Frequent lateness or non-attendance at school
- Untreated medical problems
- Low self-esteem
- Neurotic behaviour
- No social relationships
- Running away
- Compulsive stealing or scavenging

Emotional Abuse

Emotional Abuse is the persistent emotional ill-treatment of a child/young person such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to the child that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as the overprotection and limitation of exploring 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, 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, though it may occur alone.

Signs and symptoms of emotional abuse could include:

- Physical and emotional development lags
- Admission of punishment which appears excessive
- Over-reaction to mistakes
- Continual self-depreciation
- Sudden speech disorders
- Fear of new situations
- Inappropriate emotional responses to painful situations
- Neurotic behaviour
- Self-mutilation
- Social isolation - few friends
- Fear of parents being contacted
- Extremes of passivity or aggression
- Drug/solvent abuse
- Compulsive stealing or scavenging

Sexual Abuse

Sexual abuse involves forcing or enticing a child/young person to take part in sexual activities, whether or not the child/young person is aware of what is happening. These may involve physical contact, including penetrative or non-penetrative acts. It may include involving children or looking at, or being in the production of sexual on-line images, watching sexual activities, or encouraging children to behave in sexually inappropriate ways. It should be noted and remembered that abuse may be carried out by men or women, or by young people themselves. Also included in this category are Grooming, Female Genital Mutilation and Child Sexual Exploitation.

Signs and symptoms of sexual abuse could include:

- Sudden changes in behaviour or performance
- Displays of affection in a sexual way, inappropriate to age
- Sexual awareness inappropriate to age
- Tendency to cling and need reassurance
- Tendency to cry easily
- Regression to younger behavioural traits
- Complaints of genital itching or persistent infections in anal or genital regions
- Distrust of a familiar adult, or anxiety about being left with a relative or babysitter
- Bruises, scratches, bite marks on the body
- Unexplained gifts of money
- Depression and withdrawal
- Apparent secrecy
- Incontinence
- Sleep disturbances or nightmares
- Chronic illnesses, especially throat infections and venereal diseases
- Anorexia or bulimia
- Frequent masturbation
- Unexplained pregnancy

- Fear of undressing for games
- Phobias and panic attacks

Grooming

Grooming is a subtle, gradual, and escalating process of building trust with a young person. It is deliberate and purposeful. It may take place over weeks, months, or even years before any sexual abuse actually takes place. It may happen via the internet or social media, or in person. It usually begins with behaviours that may not even seem to be inappropriate.

Grooming young people may include strategies such as:

- Identifying with the child/young person.
- The abuser may appear to be the only one who understands him/her. Displaying common interests in sports, music, movies, video games, television shows, etc.
- Recognizing and filling the child/young person's need for affection and attention.
- Giving gifts or special privileges to the child/young person's.
- Allowing or encouraging the child/young person to break rules (e.g., smoking, drinking, using drugs, viewing pornography).
- Communicating with the child/young person outside of the person's normal or professional role (e.g., teacher, or coach). This could include, for example, texting or emailing the young person without the parents' knowledge

Child Sexual Exploitation

Child sexual exploitation 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. It can involve violent, humiliating and degrading sexual assaults. Consent cannot be given, even when a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. It does not always involve physical contact and can happen online.

Child Sexual Exploitation can affect any child or young person under the age of 18, including 16 and 17 year olds who can legally consent to have sex: it can still be abuse even if the sexual activity appears consensual.

Child Sexual Exploitation is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors, including gender, sexual identity, cognitive ability, physical strength, status, access to economic or other resources.

A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

Indicators of Child Sexual Exploitation may include:

- Children who appear with unexplained gifts or new possessions
- Children who associate with other young people involved in exploitation
- Children who have older boyfriends or girlfriends
- Children who suffer from sexually transmitted infections or become pregnant
- Children who suffer from changes in emotional wellbeing
- Children who misuse drugs and alcohol
- Children who go missing for periods of time or regularly come home late.
- Children who regularly miss school or education.

Sexual Violence and Sexual Harassment between Children

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

Children who are victims will find the experience stressful and distressing. This will in all likelihood adversely affect their educational attainment.

Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline and are never acceptable. All victims will be taken seriously and offered appropriate support.

Staff should be aware of:

- Some groups being potentially more at risk: evidence suggests girls, children with SEN and LGBT children.
- A responsibility to make it clear that sexual violence and sexual harassment is not acceptable, and will not be tolerated. It is not an inevitable part of growing up.
- A responsibility not to tolerate or dismiss sexual violence or sexual harassment as 'banter', 'growing up', 'having a laugh' 'boys being boys'
- A responsibility to challenge behaviours such as grabbing bottoms, breasts and genitalia, lifting up skirts etc.

Dismissing or tolerating such behaviours risks normalising them.

Sexual Violence refers to sexual offences under the Sexual Offences Act 2003, and includes rape, assault by penetration and sexual assault, when it is intentional, and when there is no consent or a person does not reasonably believe there is consent.

Consent is about having the freedom and capacity to choose. It may be given to one sort of sexual activity but not to another. It can be withdrawn at any time during sexual activity and each time activity occurs.

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

Sexual Harassment can include:

- Sexual comments such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexual names.
- Sexual jokes or taunting.
- Physical behaviour such as; deliberately brushing up against someone, interfering with someone's clothes, displaying photos or drawings of a sexual nature, taking photos of an explicit nature such as 'upskirting'.
- Online sexual harassment. This may be standalone, or part of a wider pattern. It may include:
 - Non-consensual sharing of sexual images and videos
 - Sexualised online bullying
 - Unwanted sexual comments and messages, including on social media
 - Sexual exploitation, including coercion and threats.

The initial response to a child who tells you about this type of abuse is extremely important. It is essential that all victims are reassured and that they are taken seriously, supported and kept safe. The DSL must be contacted immediately.

Child Criminal Exploitation: County Lines

Drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Indicators will be very similar to other forms of abuse and exploitation.

Domestic Abuse

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

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Exposure to domestic abuse and/or violence can have serious long lasting emotional impacts on children. Domestic abuse concerning young people can occur within their personal relationships, as well as in the context of their home life.

Female genital mutilation (FGM)

This is a form of child abuse which has devastating physical and psychological consequences for girls and women. The World Health Organization describes it as: "procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons" (WHO, 2013). Since 1985 it has been a serious criminal offence under the Prohibition of Female Circumcision Act to perform FGM or to assist a girl to perform FGM on herself. The Female Genital Mutilation Act 2003 tightened this law to criminalise FGM being carried out on UK citizens overseas. Anyone found guilty of the offence faces a maximum penalty of 14 years in prison. There is now a mandatory reporting duty; all **teachers** are required, by law to report personally to the Police, if there is any evidence FGM has taken place or is about to happen. Norfolk Police can be reached by dialling 101, or in an emergency, 999. This is a statutory duty upon teachers alongside health and social care professionals. Other staff should refer to the DSL for immediate action.

A girl at immediate risk of FGM may not know what's going to happen, but she might talk about:

- being taken 'home' to visit family
- a special occasion to 'become a woman'
- an older female relative visiting the UK.

She may ask a teacher or another adult for help if she suspects FGM is going to happen or she may run away from home or miss school.

A girl or woman who's had FGM may:

- have difficulty walking, sitting or standing
- spend longer than normal in the bathroom or toilet
- have unusual behaviour after an absence from school or college
- be particularly reluctant to undergo normal medical examinations, or ask for help, and may not be explicit about the problem due to embarrassment or fear

So called 'Honour Based' Violence

So called 'Honour Based' Violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including FGM and forced marriage. All forms of so called HBV are abuse (regardless of the motivation) and should be handled as such.

Forced Marriage

Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties. Concerns must be reported to the DSL to escalate.

Vulnerability to Radicalisation and 'PREVENT'

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism. The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation.

Gresham's School is clear that this exploitation and radicalisation should be viewed as a safeguarding concern, and we will seek to protect children and young people against the messages of violent extremism.

There is no such thing as a "typical extremist": those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in

violent extremist activity. Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that staff are able to recognise those vulnerabilities.

Indicators of vulnerability include:

- Identity Crisis – the student / pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
- Personal Crisis – the student / pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
- Personal Circumstances – migration; local community tensions; and events affecting the student / pupil's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
- Unmet Aspirations – the student / pupil may have perceptions of injustice; a feeling of failure; rejection of civic life;
- Special Educational Need – students / pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

This list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

More critical risk factors could include:

- Being in contact with extremist recruiters;
- Accessing violent extremist websites, especially those with a social networking element;
- Possessing or accessing violent extremist literature;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining or seeking to join extremist organisations; and significant changes to appearance and/or behaviour;
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

Action:

- Screening & monitoring of School network by IT staff, in close association with Deputy Head Pastoral; awareness of the need for vigilance about pupils accessing websites which are connected with radicalised or terrorist activity.
- Vigilance by House staff and other staff for changes in pupil's behaviour (as above).
- Staff to report any concerns immediately to DSL and Deputy Head Pastoral. DSL to report immediately to Children's Social Care, MASHSupervisors@norfolk.pnn.police.uk; using the *Person Vulnerable to Radicalisation (VTR) Referral Form*. This will access the Chanel process the police, and Children's Social Care as appropriate.
- Engagement with parents/the family will be considered as they are in a key position to spot signs. Families will be helped and supported and guided to support mechanisms.
- DSL to also consider DfE helpline 02073407264 or counter.extremism@education.gsi.gov.uk
- Close communication with School Prefects in weekly meetings to raise any of their concerns or observations.
- *Guidelines on Teaching Political Issues at Gresham's* included in Teachers' Handbook Appendix 2.
- All staff trained by the DSL to be aware of indicators of vulnerability, the 'PREVENT' strategy, and how 'Chanel' process works.

Notes:

Whilst the Counter Terrorism Local Profile (CTLTP) identifies that Norfolk in general may experience a low level of risk it is important to note that:

- Risk will vary greatly and can change rapidly - no area, institution or body is risk free
- The threat is real and affects all communities

Children Missing Education

Children missing education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. Children missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life. Effective information sharing between parents, schools and local authorities is critical to ensuring that all children of compulsory school age are safe and receiving suitable education.

The School has a duty to report to the LEA if a pupil arrives, or departs the School at a non-standard transition point. Please refer to the School attendance policy: <https://www.greshams.com/wp-content/uploads/2017/11/Attendance-Policy-all-three-schools.pdf>

Staff should all be fully conversant with the Attendance Policy, and report any concerns to the DSL.

Significant Harm

Some children are in need of protection because they are suffering or likely to suffer significant harm. The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of children. The Local Authority is under a duty to make enquiries, or cause enquiries to be made where it has reasonable cause to suspect a child is suffering, or likely to suffer, significant harm. Decisions about significant harm are complex and should be informed by careful assessment of the child's circumstances, and discussion between the statutory agencies and the child and family.

Definition of harm and significant harm from Adoption & Children Act 2002, Section 10

- Ill treatment or the impairment of health or development (impairment suffered from seeing or hearing the ill treatment of another)
- **'Development'** means physical, intellectual, emotional, social or behavioural development
- **'Health'** means physical or mental health
- **'Ill treatment'** includes sexual abuse and forms of ill-treatment which are not physical

Recognition of Significant Harm

Any allegation of a sexual nature, or parents whose behaviour may present risk because of:

- Domestic violence, drug & alcohol abuse and mental health problems
- Any physical injury caused by assault or neglect which requires medical attention
- Repeated incidents of physical harm
- Any contact with a person assessed as presenting a risk to children, or children who live in low warmth, high criticism environments, and children who suffer from persistent neglect
- Children who may be involved in prostitution
- Other circumstances where professional judgement and/or evidence suggest a child's health, development or welfare may be significantly harmed

Stress and Distress

An abused child will usually show signs of stress and distress. Possible signs of abuse include, but are not limited to, those listed below. Many of these may of course have nothing to do with abuse, but are worth consideration in trying to understand the child's behaviour:

- A fall-off in school performance

- Aggressive or hostile behaviour
- Difficulties in relationships with peers
- Excessively affectionate or sexual behaviour towards adults or other children
- Regression to more immature forms of behaviour
- Self-harming or suicidal behaviour
- No reasonable or consistent explanation for a pupil's injuries, or a pattern of injuries
- Disturbed sleep

05. Roles and Responsibilities

It is the duty and responsibility of all involved in the care of young people at Gresham's School to recognise and exercise the trust placed in us, ensuring that the best interests of the child/young person are always paramount, and that Safeguarding is the responsibility of all staff and volunteers working with our pupils.

The Designated Safeguarding Leads

Senior School	Mrs Julie Flower, Director of Pastoral Care, AMG, (07900 608642), is the Designated Safeguarding Lead, Mr Christopher Cox, Housemaster of Tallis and Teacher (07823321834), and Mr Will Chuter, Deputy Head Pastoral (07795571556) and Mr Tom Burnett, Teacher, are the Deputy Safeguarding Leads. They have responsibility for contacting the Children's Services to register concern about a child's welfare and implementing measures relating to Child Protection. Mrs Julie Flower is the first point of contact for parents, pupils, all staff and external agencies in matters of Child Protection. She has ultimate lead responsibility for safeguarding. Mr Christopher Cox, Mr Will Chuter, and Mr Tom Burnett are fully trained to stand in for the DSL at any time.
Prep School	Mrs Jemma Fenn (07388940065), is the Designated Safeguarding Lead, Mrs Katie Fields, Housemistress of Crossways House (07388940063), Mrs James Horsley, Housemaster of Kenwyn House (07388940065) are the Deputy Designated Safeguarding Leads. They have responsibility for contacting Children's Services to register concern about a child's welfare and implementing measures relating to Child Protection.
Pre-Prep School	Mrs Louise Down (EYFS) (01263 7142561) is the Designated Safeguarding Lead for the Pre-Prep. Mrs Sarah Hollingsworth, Headmistress, (01263 714563), and Mrs Jemma Fenn (Prep School), are the Deputy Safeguarding Leads. They have responsibility for contacting the Children's Services to register concern about a child's welfare and implementing measures relating to Child Protection. Mrs Louise Down is the first point of contact for parents, pupils, all staff and external agencies in matters of Child Protection.

Their responsibilities are to:

- Be conversant with Local Safeguarding Children Board procedures
- Consult and refer cases under Local Safeguarding Children Board procedures
- Consult the Children's Services department on issues such as informing parents, informing other children or staff, seeking medical help, if an allegation or suspicion occurs
- Organise training on Child Protection within the School, for staff and senior pupils
- Attend training every 2 years.
- Keep the Head informed if appropriate
- Be aware of the role of other agencies
- Cooperate as fully as possible with Police and Children's Services investigations - and ask to participate in their planning meetings if appropriate
- Keep appropriate records
- Support staff

- Be available for staff in person during School hours, and by mobile at all other times. Advise staff of absence from School and availability of Deputy or alternative DSLs.
- Monitor and evaluate the effectiveness and implementation of the School's Child Protection Policy
- Assume overall responsibility for online safety with respect to safeguarding
- Meet regularly to discuss Safeguarding and Child Protection matters, and any pupils who may be cause for concern.
- The Designated Safeguarding Lead will inform the initiating member of staff about the action taken.

Teaching Staff

- Teachers bring a number of advantages to the recognition of child abuse:
- They have regular and frequent opportunities to observe children and changes in their behaviour.
- They have an ongoing relationship with children who may confide in them about difficulties.
- They have wide knowledge of the wide range of behaviour likely to be seen in children of a particular age.
- They have opportunities to observe the response of a group of children to particular situations. They will therefore be sensitive to surprising or unusual responses.

All Staff

Every member of staff including volunteers working with children at our school are advised to maintain an attitude of '*it could happen here*' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child and have a responsibility to take action as outlined in this policy.

All staff are encouraged to report any concerns that they have and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns in accordance with this policy to allow the DSL to build up a picture and access support for the child at the earliest opportunity. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.

Whilst the Data Protection Act 1998 places duties on organisations and individuals to process information fairly and lawfully, it is not a barrier to sharing information where the failure to do so could result in a child being placed at risk of harm. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

If a member of staff believes or suspects that a crime may have been committed then the police should be contacted immediately.

If, at any point, there is a risk of immediate serious harm to a child a referral should be made to Children's Services immediately. **Anybody can make a referral.**

If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration by raising concerns again with the DSL and/or the Head. Concerns should always lead to help for the child at some point.

The School does not require parental consent for referral to statutory agencies

Staff should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with Children's Services, or the police if:

- The situation is an emergency and the DSL, the Deputy DSL and the Head are all unavailable;
- They are convinced that a direct report is the only way to ensure the pupil's safety.

Any member of staff who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the Head or the Chair of Governors. If any member of staff does not feel the situation has been addressed appropriately at this point should contact Children's Services directly with their concerns.

A referral to Children's Social Care should be responded to by Children's Social Care with 24 hrs. Staff must follow up a referral if information is not forthcoming.

Staff wishing to raise concerns about safeguarding practices within the School should speak directly to the DSL or the Headmaster, or any other member of the SLT; such concerns will be taken seriously. The NSPCC whistle blowing helpline is available for any staff who do not feel able to raise such concerns: 08000280285 or help@nspcc.org.uk

Helping a child who wants to tell you about his/her abuse

- Staff should remember that the priority is to protect the child. The matter should be taken seriously. React calmly, listen carefully, observe but do not judge. Don't stop the child who is freely recalling significant events. Reassure the child that s/he has done the right thing in telling you. Indicate the action you will take and make it clear that you will have to tell the Designated Safeguarding Lead (no secrets). If the child comes back to talk at a later stage s/he should be told that you cannot comment or advise as that might affect his/her security, but you can listen. Bear in mind these 'must nots':
- Do not drag the child to the Designated Person
- Do not yourself contact the parents
- Do not interrogate the child or ask leading questions
- Do not speak to anyone about whom allegations are made, including colleagues
- Do not promise confidentiality
- Do not ask a child outright if s/he or others have suffered abuse
- Avoid criticising the alleged perpetrator

06. Safer Recruitment

All appointments to the staff are checked in the following ways:

- Written references are obtained for all staff, before interview, and we do not accept testimonials. This is the same for internal candidates. Those references will include specific comments about the suitability of the applicant to work in a residential school. References received electronically will be subject to checks by the HR department, to confirm that they are from a legitimate source. Gaps in CVs are investigated. The identity and qualifications of the applicant are checked, and we require evidence of original academic certificates. The Headmaster has completed the online training on Safer Recruitment and the whole application and interview process is underpinned by Safer Recruitment in Education guidance. At least one person on the interview panel will have been trained in Safer Recruitment.
- All members of staff, both academic and non-academic, who will have unsupervised access to the children will be checked at the enhanced level for criminal records via the police and the Disclosure and Barring Service (DBS).
- We will maintain a Single Central Register of all Safer Recruitment checks carried out in line with statutory requirements.
- The Single Central register is reviewed termly, by at least two of the following; The Bursar, Governor responsible for Safeguarding and the DSL.
- Staff awaiting DBS clearance, Gap students and volunteers' access to children is only under appropriate supervision at all times. Staff awaiting DBS clearance will have the progress of their application checked every two weeks.
- The School Recruitment Policy sets out this process from beginning to end and can be found in the Staff Handbook, Part 4.
- For all persons over 16 (not on the roll of the school) who after April 2002 began to live on the same premises as boarders but are not employed by the school, an enhanced certificate with a barred list information is obtained from the Disclosure and Barring Service (DBS).
- There is a written agreement between the school and any person over 16 not employed by the school but living in the same premises as boarders (for example, members of staff households). This specifies the

terms of their accommodation, guidance on contact with boarders, their responsibilities to supervise their visitors, and notice that accommodation may cease to be provided if there is evidence that they are unsuitable to have regular contact with pupils.

- All persons visiting boarding accommodating (e.g. visitors, outside delivery and maintenance personnel) are kept under sufficient staff supervision to prevent them gaining substantial unsupervised access to boarders or their accommodation. See Access to Boarding Houses, Staff Handbook.
- Care is taken to ensure visiting speakers are suitable and supervised at all times. Where appropriate background research is conducted including internet searches.
- Care is taken to ensure that when our pupils are off site at particular events or activities, staff of these organisations/facilities are suitable to supervise them. Pupils are accompanied by Gresham's staff in this context. Staff Handbook, Part 8, Section 15, Taking Pupils Out of School.
- Pupils taking part in exchange visits: it is recognised that DBS cannot access criminal records held overseas, and therefore host families in other countries cannot be checked in the same way by local authorities. We work with partner schools abroad to ensure that similar assurances are undertaken prior to a visit.
- Parents of our own pupils who host pupils visiting our School on a residential basis (such as exchange visits, visiting sports tours) will be DBS checked

07. Training and Induction

- When new staff, volunteers, temporary staff, or regular visitors join our school, they will be informed of the safeguarding arrangements in place.
- Every new member of staff or volunteer undertakes an online Child Protection training programme, and information on Staff Code of Conduct and Whistleblowing Policy is delivered by the HR department, before commencing work. There is also an induction session with the DSL on the first day of work. The induction session reinforces online learning and reminds staff and volunteers of their responsibility to safeguard all children at our school, and confirms the remit of the role of the Designated Safeguarding Lead.

Key elements of induction meeting with DSL for new staff	
Explain	Provide
Safeguarding Policy Staff Code of Conduct Pupils' Behaviour Policy Safeguarding response to Children Missing Education Role of the DSL, including identity of DSL and deputies Online Safety	Safeguarding Policy Staff Code of Conduct Children Missing Education Policy Part One of KCSIE Annex A KCSIE for those working directly with children Role of DSL and DDSL

- Every visitor to the School will be given a set of our safeguarding procedures; they will be informed of who the DSL is and the Deputy DSL, and what the recording and reporting system is.
- All members of staff, the Head, and volunteers in regulated activity, will undertake appropriate safeguarding training at least annually, and in addition online Level 2 training is updated every three years. The DSLs and the Deputy DSL will, in addition, attend multi-agency training courses run by Norfolk Safeguarding Children's Board at least once every two years, and will attend **Designated Safeguarding Lead Training for Education** provided by the Local Authority every two years.
- All members of staff, the Head, and volunteers have training from the DSL at least annually, and training reflects new advice and statutory guidance. Updates are also communicated electronically and at staff briefings/INSET
- All members of staff, the Head, and volunteers in regulated activity read Keeping Children Safe in Education Part 1 and Annexe A.
- All staff are trained to be aware of indicators of vulnerability to radicalisation, the 'PREVENT' strategy, and how the 'Channel' process works
- For Pupil School Guides taking prospective parents on a tour of the School, suitable training is delivered and guidelines for personal safety form part of the training. Please see Staff handbook, Part 8, Appendices 26, School Tour Guides and Visitors to School.
- Our Governor responsible for Child Protection will also undertake appropriate training to ensure she is able to carry out their duty to safeguard all of the children at our school.
- The DSL will also provide regular safeguarding updates for staff, Head and volunteers.

08. Monitoring and Recording

Monitoring and Recording

It is important that all staff are engaged in Active Monitoring and are clear about the needs for written records in Safeguarding and promoting the Welfare of Children. Monitoring can help to identify abuse, even when none has been alleged or suspected.

Active monitoring:

- A collective eye on a child's safety
- Consideration of what is happening to the family
- Attendance
- Appearance
- Mood and behaviour

- Relationship with peers
- Relationship with staff
- Health
- Play
- Writing or drawing
- Signs of further abuse

The School has agreed to inform the LEA if, for any pupil, unauthorised absences exceed 5% of their total attendance for the year.

The School will also inform the relevant LEA and/or Children's Social Care (CSC), as appropriate, immediately if:

- A single absence raises child protection concerns (see the Missing Pupil Policy and the Safeguarding and Child Protection Policy);
- A pupil has four and a half days of unauthorised absence in any six-week period (other than for reasons of sickness or leave of absence);
- A pupil of compulsory school age is to be deleted from the school register when the next school is not known. In this last case, the School is required to report the circumstances, as soon as possible after the grounds for deletion are met, to the LEA in which the pupil lives and in any event before the pupil's name is deleted from the register.
- A pupil leaves or starts the School at a 'non-standard transition point.'

Further information on attendance may be found in the School's Attendance Policy

<https://www.greshams.com/assets/uploads/2017/01/Attendance-Policy-all-three-schools.pdf>

Early Help and Family Support Process

Early Help is a multi-agency process taking action to support a child, young person or their family early in the life of a problem, as soon as it emerges, and applies to any problem or need that the family cannot deal with or meet on their own.

Staff should be particularly alert to the potential need for Early Help for a child who:

- Is disabled and has specific additional needs
- Has SEN
- Is a young carer
- Is showing signs of being drawn into anti-social or criminal behaviour.
- Is misusing drugs or alcohol
- Is frequently missing
- Is at risk of trafficking or exploitation
- Is in a family circumstance presenting challenges for the child
- Has returned home to the family from care
- Is showing early signs of abuse or neglect
- Is at risk of being radicalised or exploited
- Is a privately fostered child

Contextual Safeguarding

Safeguarding incidents and behaviours can be associated with factors outside the School and can occur between children outside the School. All staff, but especially the DSL and DDSL should consider the context within which such incidents and behaviours occur. This is known as Contextual Safeguarding.

Assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety/welfare. It is therefore very important that staff and the school provide as much information as possible as part of any referral process.

All staff have a statutory duty to pass on any Child Protection concerns and to follow these School (and local LSCB) procedures (Education Act 2002 & Children Act 2004):

- Be alert to signs of abuse.

- Take immediate action in the child's best interest by reporting any evidence of abuse or non-accidental injury to the DSL.
- Know the role of the DSL and School procedures.
- Enquire about the progress of individual cases in which they are/have been involved.
- Thereafter accept their restricted role as the case becomes the province of other agencies.
- Record accurately in writing information that may be required in Child Protection procedures. This note should record the time, date, place and people who were present as well as what was said. All evidence, for example scribbled notes, mobile phones with text messages, clothing and computers must be safeguarded and preserved. Also, make a note of what happened next.

Summary of Disclosure

- No member of staff may keep a disclosure by a child confidential. The special position of the School Chaplain is recognised but there is a statutory responsibility on all staff to report any allegations immediately, and this includes the School Chaplain.
- Alleged victims or perpetrators should not be interviewed by school staff to elicit further information. A detailed written record, which must be signed and dated, must be made by staff, of any allegation, however unpalatable, and presented to the Designated Safeguarding Lead, Alternative Designated Safeguarding Lead, or the Headmaster immediately. The form for this can be found in the Staff Handbook, Part 6, Appendix 1.

09. Ten Key Points to Follow if you Suspect, or Are Told of Abuse

The following guidelines may be helpful. They were compiled by Dr Roger Morgan OBE, who is the Children's Rights Director.

- Adults looking after children or young people in schools (or in residential establishments or youth organisations) should be aware of the risks of abuse (by adults or other young people), and take steps to reduce those risks.
- Adults (staff or volunteers) in charge of children or young people should know what to do if they suspect that someone is being physically or sexually abused, or if someone tells them that this is happening. The following key points give a guide on what to do and not to do:
- Always stop and listen straight away to someone who wants to tell you about incidents or suspicions of abuse.
- If you can, write brief notes of what they are telling you while they are speaking (these may help later if you have to remember exactly what was said) – and keep your original notes, however rough, and even if you wrote on the back of something else (it's what you wrote at the time that may be important later – not a tidier and improved version you wrote up afterwards!). If you don't have the means to write at the time, make notes of what was said as soon as possible afterwards.
- Do not give a guarantee that you will keep what is said confidential or secret – if you are told about abuse, you have the responsibility to tell the right people to get something done about it (see below). If asked, explain that you will only tell people who absolutely have to know.
- Don't ask leading questions that might give your own ideas of what might have happened (e.g. 'did he do X to you?') – just ask "What do you want to tell me?" or "Is there anything else you want to say?"
- Immediately tell the person in charge of the school or group (unless they are themselves accused or suspected of abusing) – don't tell other adults or young people what you have been told.
- Discuss with the person in charge whether any steps need to be taken to protect the person who has told you about the abuse (this may need to be discussed with the person who told you).
- Never attempt to carry out an investigation of suspected or alleged abuse by interviewing people, etc. – the Children's Services Department of the Local Authority and police staff are the people trained to do this – you could cause more damage and spoil possible criminal damage proceedings.
- As soon as possible (and certainly the same day) the person in charge should refer the matter to Children's Services Department telephone number 0344 800 8014. Follow their requests about what to do next. They will set up any necessary investigations, and can advise you – that is their statutory job. If someone has made an allegation about the adult in charge of the school or group, YOU should contact the LADO and ask for advice.
- Never think abuse is impossible in your school or group, or that an accusation against someone you know well and trust is bound to be wrong.

- Children and young people often tell other young people, rather than staff or other adults, about abuse – make sure that your senior young people know the points on this sheet as well as the responsible adults (e.g. prefects, cadre NCOs, young people leading activities for others).
- **Important:**
- Bullying can develop into physical or sexual abuse – as can idiosyncratic punishments introduced by individuals: we have effective school practices to counter and monitor bullying and misuse of discipline.
- Be vigilant for early warning signs – such as favouritism, development of excessive one-to-one contact, increased involvement with changing or showering.
- Openly discuss within the staff group issues such as acceptable and unacceptable touching.
- Openly discuss with pupils, issues such as times of day or week, and locations in school, that are high risk for bullying or illicit activities.
- Be aware that children can be particularly vulnerable in residential settings and be alert to pupil relationships and the potential for peer abuse.

10. Reporting Procedure

A member of staff needs only reasonable cause for concern in order to act. One sentence from the child indicating abuse or non-accidental injury provides you with reasonable grounds and is sufficient for you to act. This may also apply if clear information comes from a sibling or another adult. However, as many of the signs of child abuse are also commonly associated with other medical, social or psychological problems, a member of staff may naturally wish to discuss some initial concerns with other staff. Concerns should be passed to the Designated Safeguarding Lead in writing without delay, using the reporting form found here:

<https://www.greshams.com/assets/uploads/Recording-Form-for-Safeguarding-Concerns-and-Body-Map.pdf>

Safeguarding Pathways

- Concerns about children who have suffered or who are likely to suffer significant harm are reported to MASH immediately in accordance with procedures outlined in this policy.
- Concerns about children who are in need of additional support from one or more agencies are dealt with via inter-agency assessment using local processes, including use of the Family Support Process (a shared assessment and planning framework for professionals who work with children and families) and Team around the Child (TAC) approaches.

Child Protection Referrals – CADS and MASH

- Where an agency/organisation or worker has concern for the welfare of safety of a child, the initial call should be to the Children's Advice and Duty Service (**CADS**) 0344 800 8021. This service was initiated in October 2018, it does not replace **MASH**, merely provides a conduit to appropriate support and referral process.
- When you call **CADS**, you will be asked a series of questions, which ideally you will find out before you call. In the event of an emergency, where the child is at immediate risk of harm, this should not hinder your referral. You can find out how to prepare for a **CADS** call here. <https://www.norfolkscb.org/wp-content/uploads/2015/04/CADS-flowchart-FINAL.pdf>
- Norfolk Multi-Agency Safeguarding Hub (**MASH**) undertakes the initial receipt and triaging of the NSCB1 referral forms.
- A telephone referral must then be confirmed in writing using the form marked NSCB1, within a maximum of 48 hours, ideally 24 hours. The completed NSCB1 can be:

- Faxed to the MASH Team on: 01603 762445
 - Posted to the MASH Team Manager, Floor 5, Vantage House, Fishers Lane, Norwich, Norfolk NR2 1ET
 - NSBC1 forms can also be emailed to MASH via mash@norfolk.gcsx.gov.uk but must only be sent from a secure email address.
- There should be a response to a referral within 24hrs, and if information is not forthcoming, the matter must be followed up.

11. Working with Parents and Carers

- Gresham's is committed to working in partnership with parents/carers to safeguard and promote the welfare of children and to support them to understand our statutory responsibilities in this area.
- When new pupils join our School, parents and carers will be informed that we have a safeguarding policy. A copy will be provided to parents on request and is referenced in the school prospectus.
- We are committed to working with parents positively, openly and honestly. We ensure that all parents are treated with respect, dignity and courtesy. We respect parents' right to privacy and confidentiality and will not share sensitive information unless we have permission for it, or it is necessary to do so in order to safeguard a child from harm.
- We will seek to share with parents any concerns we may have about their child **unless** to do so may place a child at increased risk of harm. A lack of parental engagement or agreement regarding concerns the school has about a child will not prevent the DSL making a referral to Children's Services in those circumstances where it is appropriate to do so.

12. Allegations Against School Staff

These relate to: a member of staff who 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/children in a way that indicates he/she is unsuitable to work with children.

Our aim is to provide a safe and supportive environment which secures the well-being and very best outcomes for the children at our school. We do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made. Allegations sometimes arise from a differing understanding of the same event, but when they occur they are distressing and difficult for all concerned. We also recognise that many allegations are genuine and there are some adults who deliberately seek to harm or abuse children.

Teachers and school staff must protect themselves, and staff should bear in mind that even perfectly innocent actions can sometimes be misconstrued. Children may find being touched uncomfortable or distressing for a variety of reasons. It is also important not to touch pupils, however casually, in ways of on parts of the body that might be considered indecent. See also Staff Handbook, Part 8 Teaching Manual guidance section 12.35 '*Appropriate Physical Contact and the Use of Force to Restrain Pupils*'.

The Sexual Offences Act (Amended) 2003 states that it is a criminal offence for a person aged 18 or over in a position of trust in a school to engage in any sexual activity with a person under the age of 18 (in that school) irrespective of the age of consent, even if the basis of their relationship is consensual. In circumstances which involve an allegation against a member of staff, the responsibility for dealing with the matter lies with the Headmaster.

- Allegations against staff, Gap students or volunteers should be reported immediately to the Head or to Children's Services, but you must keep the Designated Safeguarding Lead informed. If the Head is absent, the allegation should be passed to the member of staff acting as Head. If the allegation concerns the Head, the person receiving the allegation should immediately inform the Chair of Governors without notifying the Head first. The Chair of Governors must then contact the LADO immediately for advice. If the allegation is against the DSL it should be reported to the Head. In the case of serious harm, the police should be informed from the outset. This will always be in accordance with the statutory DfE guidance and Norfolk Safeguarding Children's Board Protocol 27, and in any such matters the School will also inform and seek advice from the LADO.

Immediate suspension of the member of staff is only one of a number of options, which will be considered. Others include leave of absence, or providing a classroom assistant or colleague to be present in contact time. A member of staff in such circumstances will be advised of appropriate support, for example from his/her trades union, or a colleague contact.

- In the event of a member of boarding staff suspended pending investigation of a child protection nature, the School will ensure that satisfactory alternative accommodation arrangements have been made.

- In the event of an allegation being made against a teacher, the Head will immediately take advice from and refer the matter to the Local Authority Designated Officer (LADO). Initial contact should be to the PDC Duty Desk on **01603 307797**. The School will not undertake its own investigations without prior consultation with the LADO.
- The role of the LADO is to give advice and guidance, liaise with the DSL, the Head, the Police and other agencies as necessary, and to oversee, manage and monitor the progress of the case to ensure that it is dealt with as quickly as possible consistent with a thorough and fair process.
- If the Head is wholly satisfied that the child or children is/are not at risk of significant harm and that a reportable criminal offence has not been committed he will consider the separate need for disciplinary action. In that case, an investigation at School level would be necessary.
- There is a requirement of the School to report to the Disclosure and Barring Service (DBS), within one month of leaving the School any person (whether employed, contracted, a volunteer or student) whose services are no longer used because he or she is considered unsuitable to work with children. Failure to make a report constitutes an offence.
- In the above context, ceasing to use a person's services includes: dismissal, non-renewal of a fixed-term contract, no longer engaging/refusing to engage a supply teacher provided by an employment agency, terminating the placement of a student teacher or other trainee, no longer using staff employed by contractors, no longer using volunteers, or resignation and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training or volunteering.
- There are restrictions on the reporting or publishing of allegations against teachers and every effort will be made to maintain confidentiality and guard against unwanted publicity. These restrictions apply up to the point where the accused person is charged with an offence, or the DfE/Teaching Regulation Authority (TRA) publish information about the investigation or decision in a disciplinary case.
- As an independent School, we are also under a duty to consider making a referral to the Teaching Regulation Authority where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. The reasons such an order would be considered are: "unacceptable professional conduct", "conduct that may bring the profession into disrepute" or a "conviction at any time, for a relevant offence". Further guidance is published on the TRA website. Where a dismissal does not reach the threshold for DBS referral separate consideration will be given to a TRA referral.
- Occasionally false allegations of abuse are made. To avoid as far as possible such an allegation, and situations which may give rise to misinterpretation, staff should be guided by the following advice:

- Avoid whenever possible unobserved situations of one-to-one contact with a child. If they are unavoidable, always keep a door open and try to ensure you are within the hearing of others. The exception is one-to-one music lessons which take place in sound-proofed rooms, these rooms have a clear glass panel in the door and clear windows, with music lesson timetables with teachers' names clearly displayed in the department.
- Do not offer to transport children alone in your car without seeking advice and telling another colleague that this is what you propose to do.
- Do not engage in or allow any sexually provocative games whether based on talking or touching or engage in 'horseplay' involving children.
- Never make suggestive remarks or discriminatory comments to a child.
- Do not enter a room where a child may be changing his/her clothes or not be fully dressed without first getting his/her clear consent to enter.
- Never engage in inappropriate electronic communication (such as Facebook or Twitter, etc.) with a pupil.
- Avoid 'favouritism' and singling out 'troublemakers'.
- Never trivialise child abuse.

Also see Handbook for Appropriate Physical Conduct and the Use of Force to Restrain Pupils.

<https://intranet.greshams.com/staff-handbooks/senior-school-1/part-8---teachers-handbook-and-school-policies/812-discipline-and-school-rules/1235--appropriate-physical-contact>

Guidance on physical touch in Sport can be found in the staff handbook

Guidance on physical touch in Music can be found in the staff handbook

This Safeguarding Policy details the procedures in place to safeguard all children, including those in the EYFS; additional details, specific to safeguarding in the EYFS, are found in the box below

Personal Mobile Devices and Cameras

All staff, volunteers and visitors working with children at the Pre-Prep are provided with a secure locker to store their personal mobile devices whilst in the building. No one is allowed to use their personal mobile device except in areas where the children are not present. Photographs are only taken with school cameras and equipment and not with private cameras or devices. Parents/carers or other visitors to the school may not take photographs of children in any part of the school building or grounds school using personal cameras or mobile phones except at performances of plays in the Pre-Prep Hall or on Sports Day in the summer term. Photographs taken on these occasions must not be shared or posted on the internet e.g. on social networking sites etc. Members of staff, parent helpers in school, e.g. members of the Pre-Prep PTA, or parents/carers or other members of the family assisting on outings or visits must not use their personal cameras or mobile phones to take photographs and must only use their mobiles on a school visit in an emergency.

Reporting to Ofsted

Gresham's Pre-Prep will notify Ofsted of any allegations of serious harm or abuse by any person living, working or looking after children within Gresham's Schools, including if these allegations relate to harm or abuse committed in another location. We will inform Ofsted of the nature of these allegations and the action taken within 14 days of the allegation being made.

We will notify Ofsted and our local child protection agency of any serious accident or injury to, or the death of, any child while in our care, and will act on any advice from those agencies. We will report any incident within 14 days.

13. Whistleblowing

Staff should familiarise themselves with the School's Whistleblowing Policy, Staff Handbook Part 4, Chapter 14. We will work for a culture of safety and of raising concerns as they arise. It is particularly important in the context of Child Protection. Staff have a statutory duty to report concerns that a child is at risk of abuse, is being, or has been abused, to the Designated Lead. This is because the interests of the child are paramount. However, fear of reprisal is a real issue for staff in reporting abuse by colleagues. The Public Interest Disclosure Act 1998 provides protection against victimisation for persons who, acting in good faith, raise concerns about a wide variety of malpractices in the public interest. Ofsted offer impartial advice and guide on a special 'Whistleblowing' Helpline 08456 404046. You may also contact the independent charity 'Public Concern @ Work' for impartial advice and support, telephone 0207 4046609, or email whistle@pcaw.co.uk.

When establishing the validity of any cause for concern care will be taken:

- To protect the whistleblower
- To avoid alerting anyone about whom a concern has been raised
- To avoid alerting other colleagues who may warn the subject of the concern
- To record the information
- To keep all records secure and confidential

14. Consultation/Referrals

If the Designated Safeguarding Lead receives allegations or has suspicious of abuse, or needs advice, he will inform the Children's Services Department, or the Police directly if it is an allegation or serious criminal offence, within 24 hours of his concerns. If the consultation/referral is by telephone, a written confirmation will be made. If the case meets the criteria for eligibility, the Children's Services Department will make background enquiries, including with

the police. If the concerns appear well founded, a strategy discussion will follow, normally within two working days. At this point a decision will be taken either to proceed with an S47 enquiry/criminal investigation or not. If the concerns are substantiated and the child is deemed at continuing risk of significant harm, a Child Protection Conference will be convened.

The School will also:

- Take any necessary steps for the longer term protection and support of each pupil who has made allegations of abuse, or is alleged to have suffered from abuse, taking his or her wishes fully into account. This may involve the pupil receiving continuing support and protection from a staff member chosen by him/her, or changing boarding accommodation, or returning to his/her parents temporarily.
- Take any necessary steps to protect and support a pupil who is alleged to have abused another. The allegation may not later be substantiated, but even if it is, the School continues to have a statutory welfare responsibility towards this pupil while he/she is at the School. Ensure that any pupil being interviewed by the police has available a supportive member of staff of his/her own choice to accompany him/her if this becomes necessary.
- Take any necessary steps to support a member of staff against whom an allegation has been made, in addition to protecting their anonymity, for example, offers of external counselling and appropriate reasonable support (including medical) could be considered

15. Protocol for Searching for a Missing Pupil

In the event of a pupil being unaccountably absent, staff will:

Senior School

- Question close friends as to known destinations/suspicions and contact the Housemaster/mistress.
- Check pupil's study for personal items to make an assessment of gravity of a situation.
- Check with all other Houses and School grounds - enlist help of Duty Staff mobile: 07887 746927.
- Try to make phone contact (use the phone of a friend if possible).
- Assemble House if growing concern - to make further enquiries.
- Contact: Headmaster, Deputy Head Pastoral, The Designated Safeguarding Lead, Parents, Police - for information.
- A local area search may be in order, but only if the House is covered.

A boarder unaccounted for at night beyond the normal lockup time or unaccounted for at the weekend should be treated as a serious and reportable incident.

In the event of a pupil not being collected from School, Housemaster/mistress will:

- Contact parents and emergency contacts for further information.
- Make DSL and Deputy Head Pastoral aware of situation.
- Housemaster/mistress will take responsibility for finding a temporary boarding space if necessary.
- If the pupil is not collected when School is closing at the end of term the Housemaster/mistress will make suitable arrangements within one of the boarding houses or with emergency contact/local guardians, until the pupil can be collected, or arrangements satisfactorily made to transport pupil home (flights, taxis, trains etc.)
- DSL to refer to Children's Social Care if appropriate.

Prep School

If a pupil is missing from roll-call or from class without permission and the teacher has no knowledge of the pupil's whereabouts, the procedures should be as follows.

- Teacher sends a pupil to School Secretary to inform of absence (or phones Office if mobile available)
- School Secretary – checks with:
 - Music lesson list in Office or Common Room
 - Absentee list outside Library
 - Matron in Crossways or Kenwyn
 - Learning Support timetable in Office or Common Room
 - Team sheets for away matches in Common Room only
 - Field trip sheets in Common Room only
- School Secretary contacts Headmaster or Deputy Head (or Deputy Head Academic or Assistant Head if not available) who designates available staff to begin search of:

Prep School Buildings

- Route A: Music School, Practice Rooms, Hall, Sheds, Butterwick Centre
- Route B: Library, Rooms 12, 13, 14, 15 and Classroom Block,
- Route C: Kenwyn all areas upstairs and down, plus boiler room steps, bike sheds
- Route D: Crossways all areas upstairs and down

Playing Fields

- Including Kenwyn Lawn, Hedges, Colts Field, Cricket Pavilion, Walled Garden.

Pre-Preparatory School and OSH Buildings

- All areas outside, around Laundry and Pre-Prep car parks
- Headmaster or Deputy Head (Deputy Head Academic or Assistant Head) consults past history of absent pupil and any previous incidents recorded. Searches appropriate areas. Sends a car or cars out to search surrounding roads. If not found within 30 minutes:
 - Contacts parents
 - Contacts police
- Once pupil is found, Headmaster or Deputy Head interviews pupil and any others involved, including relevant house staff and other members of staff, to ascertain reasons for the incident. Deals with the pupil in an appropriate manner and records details on pupils' area of SIMS. If deemed necessary, informs parents.

Procedure for locating absentees from Activities

- Check absentee list
- Check play rehearsal or any other activity that might have caused absence
- Check houses, by phone or in person
- Inform the HM or Deputy HM if they are present
- Ring home if HM or Deputy is not able to
- If parents do not know of whereabouts of pupil inform HM (07748788076 or 712044) or Deputy HM (07881924478 or 713015).

Procedure for locating absentees after Activities

- If a boarder is discovered to be missing out of school time, the housemaster or housemistress should be informed immediately and he or she should instigate a search as above. The Head or Deputy Head should be informed as quickly as possible.

16. Record Keeping and Storage

Child Protection records are kept securely by the Designated Lead, separately from other pupil records. If the need arises, a non-descriptive indicator will be placed on the pupil's School file that an additional file exists and to whom further inquiries should be addressed.

17. Compliance

The School policy is regularly updated in order that we comply with new legislation and good practice. Currently the School's policy for Child Protection is consistent with, and so reinforces:

- **Working Together to Safeguard Children (2018) (WTSC)**
- **Keeping Children Safe in Education (September 2018) (KCSIE)**
- The Children Act 1989 & 2004
- The Education Act 1996 S549 banning corporal punishment
- The Education Act 2002 S157
- Boarding Schools National Minimum Standards Regulations
- Safer Working Practices for Adults who Work with Children and Young People in Education Settings, DCSF 2009
- The specific procedure for Child Protection as prescribed by the county Local Safeguarding Children Board.
- The UN Convention on the Rights of the Child, which contends that all children have an inalienable right to protection from harm.
- Human Rights Act 1998.
- The Prevent Duty 2015
- Freedom of Information Act 2000.
- OFSTED
- Sexual Offences Act (Amend) 2003 (Abuse of Trust)
- Education and Inspections Act 2006 (from 1st April 2007) SS88-99 (School Discipline & Pupil Restraint)
- Safeguarding Vulnerable Groups Act 2006 (in force from 2008) Vetting and barring.