

## SAFEGUARDING & CHILD PROTECTION

### POLICY AND PROCEDURE

Written by:	Senior Officers
Version number:	Version 32
Approved by:	Executive Committee
Date last reviewed:	October 2018
Date next review is due:	July 2019 or at next change of regulations
Managers responsible for next review:	The Designated Safeguarding Leads supported by the Head of Personnel

File name and path:

[\\consus\bs-shared\\$\Central Services Shared Documents\CS Personnel\Policies and Procedures](\\consus\bs-shared$\Central Services Shared Documents\CS Personnel\Policies and Procedures)

## Contents

	Page
<b>What we expect of every member of Staff, Volunteer and Contractor: A Checklist</b>	3
<b>Introduction; What are Safeguarding &amp; Child Protection?</b>	4
<b>Aims of this Policy</b>	5
<b>Section A: Why you might have concerns about a child or young person</b> E.g. Particularly vulnerable groups; e.g. 2 A child/ young person shares information with you ( <i>including how to behave in the event of a disclosure</i> ); e.g. 3 Indications of Possible Maltreatment, Abuse, & Neglect ( <i>with a table of types of abuse and neglect including sexual violence and harassment, including child on child sexual violence and harassment</i> )	6-14
<b>Section B: What you should do if you have concerns about a child in need or at risk; The Designated Safeguarding Leads and Deputies within the Foundation</b>	14-15
<b>What happens next?</b> Cases of Early Help or immediate referral to Children’s Social Care/ Police; Arrangements under KCSIE 2018; Why is all this important?	16-17
<b>Section C: Allegations Against Staff/ Volunteers/Contractors/Others; Staff Behaviour, Recruitment &amp; Training:</b> What must happen if you have a concern about a member of staff’s/ volunteer’s behaviour	18
<b>Staff/ Volunteers’ Behaviour</b> including the taking of images in the EYFS; physical contact with pupils; Sexual Offences Act and those in a position of trust or authority	18-19
<b>Staff/ Volunteers’ Suitability</b> including regulated activity, supervision, and checks regarding work experience, homestays	20
<b>Staff Training in Safeguarding</b> including at Induction	21-22
<b>Section D: How the Foundation Supports the Welfare of the Child in Everyday Situations; How are Safeguarding and Child Protection Procedures Reviewed in the Foundation?</b>	23-24
<b>Annex 1: Role and Responsibilities of the Designated Safeguarding Leads and Deputies for Child Protection</b>	25-27
<b>Annex 2: Key Definitions &amp; Further Information About Issues Mentioned in this Policy</b>	28-30
<b>Annex 3: Bolton Safeguarding Partner’s Flow Diagram of Action when a child has suffered or is likely to suffer harm (excluding allegations about a member of staff)</b>	31-32
<b>Annex 4: Bolton Early Help Procedures</b>	32
<b>Annex 5: Key Contact Details and Websites</b>	32-34
<b>Appendix 1: Foundation Policy on ‘Prevent’</b>	35-37
<b>Appendix 2: Foundation Policy on E-Safety</b>	37-39

## What we expect of every member of Staff, Volunteer and Contractor

The Foundation aims to safeguard and promote the welfare of children by helping to protect them from maltreatment; prevent impairment of their health or development; ensure that they grow up in circumstances consistent with the provision of safe and effective care; and by taking any action necessary to enable them to have the best outcomes in life. All staff, contractors, volunteers and other adults involved with the Foundation are expected to share this commitment and to do the following:

- Understand that Safeguarding and Promoting the welfare of children are **everyone's** responsibility;
- Consider at all times what is in the **best interests of the child**;
- Maintain an attitude of **'it could happen here'** at all times where safeguarding is concerned and act on any concern about a child's welfare immediately (see Section B for details), rather than assuming another colleague/ professional will take action;
- Know who is the Designated Safeguarding Lead (and any Deputies) in each setting and go to him/her over any concern, no matter how small, recognising that the DSL is most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns but also know what to do if the DSL is not available (see Section B for details);
- Be aware of the systems within the Foundation which support safeguarding and comply with these policies and procedures: the Safeguarding & Child Protection Policy; the Staff Behaviour Policy; the safeguarding response to children who go missing from education(cme); the role of the DSL and any Deputies;
- Read at least Part one of Keeping Children Safe in Education (KCSIE) in its latest version (Sept 2018) and (for school leaders and those working directly with children) Annex A;
- Receive appropriate safeguarding and child protection training which is regularly updated, e.g. via email/ staff meetings on at least an annual basis;
- Know what to do if a child tells you that s/he is being abused or neglected, including how to maintain an appropriate level of confidentiality by involving only those who need to be involved (see Section A);
- Be aware of indicators of abuse and neglect (see Section A for details) and consider the context in which they occur, working out whether the context may make a child particularly vulnerable;
- Be prepared to identify children who may benefit from Early Help (see Section B: 'What happens next?' for details) and understand your role in the process; be particularly alert to the potential need for Early Help for a child from a vulnerable group;
- Be aware that safeguarding issues can manifest themselves as peer on peer abuse and know what to do when this occurs;
- Respond appropriately to reports of sexual violence and sexual harassment, including child on child, (see p7 for details) and ensure that such behaviour is never tolerated or passed off as 'banter';
- Follow the referral processes if you have a concern about a child's welfare and support social workers and other agencies following any referral;
- Know how to behave appropriately with children, including how and when to use 'reasonable force' if appropriate (see p18-19 and the 'Policy for Staff, Volunteers, Contractors & Other Adults' for details);
- Refer any safeguarding concerns or allegations of abuse about another member of staff (or volunteer) to the appropriate person (see Section C and the 'Allegations of Abuse' policy for details);
- Raise concerns about poor or unsafe practice and potential failures in the School's/ Setting's safeguarding regime with a member of the SLT or with a whistleblowing channel outside the Foundation (see 'The Whistleblowing Policy' for details);
- Know what checks need to be in place for **all adults** working with or coming in to contact with children in the Foundation (see p20 for details), including when undertaking regulated or unregulated activity, during work experience/ school trips/ homestays, and the level of supervision required if checks are not undertaken;
- (For those staff working in EYFS) Comply with the rules about images in the EYFS (see p19) and comply with the rules governing who can or cannot work in the EYFS (see p21).

## Introduction

The Bolton School Foundation is committed to providing a safe and secure environment for children, staff and visitors (including those in the Early Years Foundation Stage (EYFS) settings), and promoting a climate where children and adults will feel confident about sharing any concerns which they have about their own safety and wellbeing or that of others.

This Safeguarding and Child Protection Policy is applicable to all on and off-site activities undertaken by pupils or other children and young people whilst they are the responsibility of the Bolton School Foundation, including at Patterdale Hall, the Nursery or Kidzone.\* Following a detailed risk assessment it has been authorised by the Governing Body and is available to parents and others on the School's website. This policy can be made available in large print or another accessible format if required. (\*Please note that *separate* safeguarding arrangements are in place for the 19th Bolton (Bolton School) Scout Group, which are carefully monitored by Greater Manchester North, Scout Association.)

This Safeguarding Policy is underpinned by the national 'Every Child Matters framework' and draws upon the duties conferred by: the Children's Acts 1989 and 2004; S175/157 of the 2002 Education Act; SS94 (1 & 2) of the Education and Skills Act 2008; The Early Years Foundation Stage (Welfare Requirements) Regulations 2012 made under Section 40 of the Childcare Act 2006; S10 of the Childcare Act 2010; the Education (Independent Schools Standards) (England) Regulations 2014; The Children and Families Act 2014; The Children and Social Work Act, 2017 and the Statutory Framework for the Early Years Foundation Stage (EYFS). It also follows the guidance contained in: 'Working Together to Safeguard Children 2018'; the DfE's statutory guidance - 'Keeping Children Safe in Education (KCSIE September 2018)'; Guidance for Safer Working Practice for those Working with Children and Young People in Education Settings, October 2015, and procedures produced by the Greater Manchester Safeguarding Children Board and the Bolton Local Authority Children and Young People's Plan and Framework for Action. The Foundation also has regard to the advice contained in the DfE's 'What to do if you're worried a child is being abused (July 2018)' and 'Information Sharing Advice for Safeguarding Practitioners' (July 2018) and the Statutory guidance issued under section 29 of the Counter-Terrorism and Security Act 2015 regarding the 'Prevent' Strategy. The Policy and relevant procedures are reviewed at least annually and may be amended when appropriate; in particular, should any deficiencies or weaknesses in Safeguarding arrangements become apparent, remedial measures will be taken without delay.

## What are Safeguarding and Child Protection?

Safeguarding and promoting the welfare of children is defined for the purposes of this policy as: protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes (KCSIE 2018). Safeguarding children's welfare encompasses matters such as bullying and health and safety, together with a range of other issues, e.g. arranging to meet the needs of children with a disability, (including any pupil with SEND or with an EHC plan), medical conditions, (including historical) mental health issues (including current or historical self-harm or body image issues), first aid, school security, drugs and substance misuse. Details of the Foundation's policies in these areas are contained in other documents. **Child Protection** is one part of safeguarding and promoting children's welfare and refers to the activity that is undertaken to protect children who are suffering or at risk of suffering significant harm (requiring immediate referral to Children's Social Care) as well as to children in need of Early Help and additional support in order to thrive (requiring inter-agency assessment).

## **Aims of this Policy**

The purpose of this policy is to:

- Describe what should be done, in accordance with locally agreed inter-agency procedures, if anyone in the Foundation has a concern about the safety or welfare of a child who attends the School or takes part in an activity organised by the Foundation, including in the EYFS settings (Section B);
- Identify the names of responsible persons in the Foundation and explain the purpose of their role (Section B);
- Explain what constitutes abuse and neglect, including Child Sexual Exploitation, Female Genital Mutilation and Radicalisation (Section B);
- Identify the particular attention that should be paid to those children who fall into a category which might be deemed 'vulnerable' (Section B);
- Inform staff and volunteers how referrals are dealt with when they are passed on to the relevant person (Section B);
- Refer staff to other policies and practices which deal with Safeguarding and Child Protection Issues (below and Section C);
- Set out expectations in respect of staff training and induction (Section C);
- Outline how the implementation of this policy will be monitored (Section D);
- Clarify the procedures and practices in place to ensure that children are kept safe and that their welfare is upheld in the everyday life of the Bolton School Foundation, including in the EYFS settings (Section D);
- Clarify the responsibilities of the Designated Safeguarding Leads and Deputies within the Foundation, including how their work conforms to local requirements (Annex 1);
- Provide a summary of information regarding referrals and an up to date list of telephone numbers with important points of contact (Annex 4);
- Provide information about the Foundation's responsibilities in line with the Prevent Strategy (Appendix 1);
- Provide information about the Foundation's responsibilities in relation to e-Safety (Appendix 2).

As indicated above, other relevant documentation can be found in the Personnel section of the Intranet and includes:

- The Allegations of Abuse Policy;
- The Safer Recruitment and Application Procedures plus the associated Guidance about Pre-Appointment Checks and Vetting and Forms for the Pre-Appointment Checks of Contractors and Supply staff;
- The Behaviour Policy for Staff, Volunteers, Contractors and Other Adults;
- The Employees' Handbook;
- The Whistleblowing Policy;
- The Foundation's Health and Safety Policies (including First Aid, Medical, School Security and Drugs Policies);
- The Foundation's Policy on Youth Produced Sexual Imagery (Sexting).

In addition, there are Anti-bullying and Behaviour Management Policies produced by the different settings in the Foundation (Boys' Division Senior and Junior/ Girls' Division Senior, Junior and Infants/ the Nursery/ Kidzone) which are shared with relevant staff.

## **Section A: Why you might have concerns about a child or young person**

### **E.g. 1**

#### **You might be aware that a child/ young person has particular vulnerabilities**

Any child may benefit from Early Help (see below) but all staff should be particularly alert to the potential need for Early Help for a child:

- who is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing or who goes missing from home/care;
- is misusing drugs or alcohol;
- is at risk of modern slavery, trafficking or exploitation;
- is involved in sexting;
- is in a family circumstance presenting challenges for the child (e.g. substance abuse, adult mental health problems or domestic abuse);
- has returned home to their family from care;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;
- is a privately fostered child.

### **E.g. 2**

#### **A child/ young person might share information with you as an individual member of staff/ volunteer about something which causes you concern:**

A child or young person may speak to you in person to disclose information or s/he may do or say something in your presence which has the effect of disclosing information about possible abuse and/or neglect. If this happens, you must always act on this information, however slight it may seem, by reporting what you are told/ hear/ observe to the DSL or Deputy DSL (or the Headmaster/mistress/Clerk and Treasurer in cases of allegations of abuse against another member of staff/ volunteer (including a Governor)/ contractor or pupil) as quickly as possible. It is not appropriate for you to make a decision whether or not abuse/ neglect has taken place- you must pass the information on to the relevant person. *See Section B below.*

**When a child or young person shares information with you about abuse or neglect, including a report of sexual violence or harassment, you should follow these guidelines:**

- Recognise that the child or young person has come to you as someone they trust;
- Reassure the victim that they are being taken seriously and that they will be supported and kept safe- do not make them feel ashamed or a nuisance for reporting the matter;
- Do not promise confidentiality but share the information only with those people who are necessary in order to progress it and tell the child/ young person what the next steps will be and who the report will be passed to;
- Listen to him/her very carefully and non-judgementally;
- Allow him/her freely to recall significant events, keeping questions to the absolute minimum necessary to ensure that you have a clear and accurate understanding of what has been said - be aware that this account may have a crucial role to play in subsequent events;

- Avoid asking 'leading' questions, i.e. a question which suggests its own answer- remember, what you say at this point may have an impact on the outcome for the child so stick to 'where', 'when', 'what', etc;
- Keep your own emotions in check and control any personal reaction you might have; maintain an open mind throughout;
- Take the child/ young person to the School Nurse if possible and if there is a medical need, but on no account examine any injury yourself;
- Make a record of the information given. KCSIE September 2018 indicates that best practice is to wait until the end of the report and immediately write a thorough summary. This allows you to devote your full attention to the child and to listen to what they are saying. It may be appropriate for you to make notes during the report (especially if a second adult is present). However, if making notes, you need to remain engaged with the child and not appear distracted by the note-taking. Either way, it is essential that a written record is made. Only record the facts as the child presents them- do not include your personal opinion. Include the date, time, place and the full names of all the people present. Record the child's/ young person's demeanour and behaviour as well as what is said. Note down any questions you asked as well as what the child said. **Remember that such reports might be part of a statutory assessment by children's social care and/or part of a criminal investigation.** Sign the record and keep it securely before handing it to the DSL as soon as possible;
- If there is material to be handed over, for example scribbled notes, mobile phones containing text messages, or clothing, keep this evidence carefully and hand it to the DSL as soon as possible;
- Explain that help may be required to keep the child/ young person safe, but do not at this stage ask him/her to repeat their account of events to anyone else as this may impact or negate the value of any best evidence interview;
- Do not talk about what you have heard or seen to anyone other than in professional conversation with the relevant persons;
- You must then pass this information on as a matter of urgency to the relevant person. S/he will take from you all the notes you have made and any relevant items which you have been given.
  - o For complaints or suspicions of abuse or neglect by persons who do not work in the Foundation, the relevant person is the Designated Safeguarding Lead or his/her Deputy.
  - o If the information includes an allegation against a member of staff, including the Designated Safeguarding Leads and Deputies, it must be passed to the Headmaster/ Headmistress/ Clerk and Treasurer or their Deputy. (For further information, including with regard to allegations against the Headmaster/ Headmistress/ Clerk and Treasurer/ Governors, see Section C below).

When dealing with a report of sexual harassment or sexual violence, including child on child harassment/ violence, in addition to the above:

- Be aware of searching, screening and confiscation advice in the relevant School's Behaviour Management Policy and the Foundation's Policy on Youth Produced Sexual Imagery: NEVER VIEW OR FORWARD ILLEGAL IMAGES OF A CHILD;
- After any such report, the DSL or Deputy should make an immediate risk and needs assessment to consider the victim (their protection and support); the alleged perpetrator; all the other children (and perhaps adult students and staff) in either Division (any actions that are appropriate to protect them); the risk assessment must be written down and kept under review;
- Measures to protect the victim/ others should be put in place immediately;
- Ensure that the alleged perpetrator is also supported and that s/he may potentially have unmet needs;
- Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers or sexual violence specialists will be required;

- In judging the response, the DSL or Deputy will consider the wishes of the victim and how they want to proceed; whether a crime or harmful sexual behaviour has occurred; the ages/ developmental stages of those involved; any power imbalance between the two; whether the incident is a one-off or part of a sustained pattern of abuse; if there are ongoing risks to others; if it is appropriate for the victim and perpetrator to share a classroom, school journey or learning space;
- An appropriate response may be a) to manage the issue internally; b) to seek Early Help; c) to refer to Children's Social Care (if a child has been harmed; is at risk of harm or is in immediate danger). In addition, where a report of rape, assault by penetration or sexual assault is made, the matter should be referred to the police. For further information, including with regard to pupils Released under Investigation, see KCSIE 2018, Part 5.

### E.g. 3

You might spot a possible indicator of maltreatment, abuse or neglect.

To help you understand the types of abuse which exist and possible indicators of maltreatment, please use the table below. *Be aware, however, that no such list is comprehensive and any concerns on your part about a child's welfare should be shared with the DSL or Deputy.* In particular, 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.

All staff, but especially the DSL or deputy, should consider the context within which incidents/ behaviours occur; this is known as contextual safeguarding. Are there wider environmental factors which threaten a child's safety and/or welfare?

In addition, some children are deemed particularly vulnerable and so particular vigilance must be exercised where they are concerned.

- **Children Subject to a Child Protection Plan:** any incidents or concerns involving these children must be reported immediately to the allocated Social Worker;
- **Looked After Children:** any incidents or concerns must be brought to the notice of the Designated Person with responsibility for children in public care (Mrs Helen Brandon in the Boys' Division, Mrs Lynne Kyle in the Girls' Division and Nursery, and Mrs Laura Smith in Kidzone);
- **Children living in a household where violence is an issue:** any pastoral concerns must be referred to the appropriate Designated Safeguarding Lead.

In addition, extra support and protection may be required for children who are vulnerable by virtue of disability, mental health issues, homelessness, refugee/ asylum seeker status, alcoholism or substance abuse within the family, as well as those who are young carers or who have English as a Second Language.

Children with Special Educational Needs and disabilities can face additional barriers when recognising abuse and neglect, including assumptions that indicators of possible abuse (e.g. behaviour, mood, and injury) relate to the child's disability without further exploration; and being more prone to isolation and/or communication barriers.

### **Indicators of Abuse and Neglect**

**Abuse** is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent him/her from suffering from harm. Children may be abused in a family, institutional, or community setting by those known to them or (more rarely) by others. Abuse can take place wholly or partly online. An individual child may be abused by an adult or adults or by another child or children.

**Physical Abuse** may include hitting, shaking, throwing, poisoning, burning/ scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent/ carer fabricates the symptoms of, or deliberately induces, illness in a child. A child may sustain a physical injury (or may be emotionally distressed) as a result of reported chastisement or may allege that s/he has been chastised by the use of an implement or substance.

**Emotional Abuse** involves the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on his/her emotional development. It may involve conveying to a child that s/he is worthless, inadequate and/or unloved or valued only insofar as s/he meets the needs of another person. It may include not giving the child the opportunity to express his/her views and/or making fun of what s/he says or how s/he communicates. It may feature age or developmentally inappropriate expectations of the child, including interactions that are beyond a child's developmental capacity or, at the other extreme, overprotection and limitation of his/her exploration, learning and/or social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation and/or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, or emotional abuse may occur on its own.

**Sexual Abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. (The sexual abuse of children by other children is a specific safeguarding issue in education; see Peer on Peer Abuse and Sexual Violence & Sexual Harassment below.)

NB a child under the age of 13 is not legally capable of consenting to sex (it is statutory rape) or other type of sexual touching and any incidents of sexual activity by children of this age should be referred to the DSL for the attention of Children's Services. Sexual activity with a child under the age of 16 is an offence. It is also an offence for a person in a position of trust and authority to have a sexual relationship with a 16 or 17 year old.

**Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. 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.

**Specific Safeguarding Issues that can put children at risk of harm:** drug-taking, alcohol abuse, missing education, sexting.

**Manifestations of Safeguarding Issues as Peer on Peer Abuse:** may include some of: bullying, cyberbullying, physical abuse, sexual violence and sexual harassment, sexting, initiation/ hazing type violence and rituals.

Some **indicators of abuse or neglect** which staff or volunteers should report to the DSL or Deputy if they have concerns about them in relation to any particular child(ren) may include:

- Unexplained or suspicious injuries (e.g. bruising, cuts or burns), particularly if situated on a part of the body not normally prone to such injuries;
- A written, oral or drawn description/ depiction by a child of what appears to be an abusive act in which they were involved;
- Unexplained changes in behaviour such as withdrawal/ sudden outbursts of temper;
- Suspected drug taking, alcohol abuse, truanting and sexting;
- Sudden poor performance in educational/ other achievement;
- Age-inappropriate sexual awareness, for example in language or knowledge;
- Sexually precocious and/or explicit behaviour, for example sexualised drawing or play at a precocious age;
- Distrustful behaviour with adults, particularly those with whom a close relationship would normally be expected;
- Difficulty in forming relationships and making friends;
- Difficulty in sleeping;
- Problems with soiling/ wetting, particularly when toileting has not previously been an issue;
- Psychosomatic symptoms, including headaches and abdominal pains;
- Signs of depression and/or suicidal tendencies;
- Deliberate self-harm, including the development of an eating disorder;
- Becoming increasingly unkempt;
- Running away or trying to do so.

In addition to these types of abuse and neglect, there is a need to be alert to the following specific Safeguarding issues:

**Child Sexual Exploitation (CSE):** a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

CSE can affect any child or young person (male or female) under the age of 18, including those over 16 who can legally consent to have sex. It can include both contact and non-contact sexual activity. It may occur without the young person's knowledge (e.g. others posting their images on line). It can be perpetrated by individuals or groups, males and females, children and adults.

Some indications of CSE are: repeatedly consorting and/or communicating with adult men or women outside the usual range of social contacts and/or other children known to be victims of CSE, including those involved in prostitution; going missing for periods of time and/or regularly staying out late; regularly missing school; appearing with unexplained gifts or possessions; displaying inappropriate sexualised behaviour; physical symptoms, e.g. a child suffering from STDs; a history of sexual abuse or poor self-image; and changes in emotional well-being.

**Child Criminal Exploitation: County Lines:** Drug networks or gangs groom and exploit young people to carry drugs and/or money from urban areas to suburban or rural areas/ market towns/ seaside towns. It can involve force and/or enticement-based methods of compliance.

**Domestic Abuse/ Violence:** Domestic Abuse/ Violence 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. Exposure to domestic abuse can have a serious, long-lasting emotional and psychological impact on children.

**Homelessness:** May be of the family or a 16/17 year old who is living independently of the family.

**Faith Abuse:** This is child abuse which is linked to faith or belief. This includes belief in concepts of witchcraft and spirit possession, demons or the devil acting through children or leading them astray (traditionally seen in some Christian beliefs), the evil eye or djinns (traditionally known in some Islamic faith contexts) and dakini (in the Hindu context); ritual or muti murders where the killing of children is believed to bring supernatural benefits or the use of their body parts is believed to produce potent magical remedies; and use of belief in magic or witchcraft to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation. This is not an exhaustive list and there will be other examples where children have been harmed when adults think that their actions have brought bad fortune, such as telephoning a wrong number which is believed by some to allow malevolent spirits to enter the home.

**Gangs and Youth Violence:** A gang is defined as a group of young people, especially young men, who spend time together, often fighting with other groups and behaving badly. Youth violence refers to harmful behaviours that can start early and continue into young adulthood. The young person can be a victim, an offender, or a witness to the violence. Youth violence includes various behaviours including some violent acts such as bullying, slapping, or hitting. These behaviours can cause more emotional harm than physical harm. Others, such as robbery and assault (with or without weapons) can lead to serious injury or even death.

**Hate Crimes/Hate Incidents:** Hate crimes are any crimes that are targeted at a person because of hostility or prejudice towards that person's disability, race or ethnicity, religion or belief, sexual orientation, transgender identity. A victim does not have to be a member of the group at which the hostility is targeted; anyone can be a victim of a hate crime. Hate incidents may feel like crimes to those who suffer them and can often escalate to crimes or tension in a community. These incidents may include verbal abuse, e.g. name calling, physical assault, e.g. being spat at or kicked, domestic abuse, harassment and damage to property.

**So called Honour Based Violence (HBV):** 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 Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. Often a wider family or community is in play. All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt staff should speak to the designated safeguarding lead. Staff need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

There are a range of potential indicators that a child may be at risk of HBV. Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found on pages 38-41 of the Multi agency statutory guidance on FGM, (pages 59 – 61 focus on the role of schools) and pages 13 – 14 of the Multi-agency guidelines: Handling cases of forced marriage; links to both documents can be found at Annex 2 of this policy.

**Female Genital Mutilation (FGM):** Female Genital Mutilation (sometimes known as female circumcision) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK but it is sometimes practised in about thirty African countries as well as in parts of the Middle East and Asia. The procedure may be carried out when the girl is new born, during childhood or adolescence, at marriage or at first

pregnancy but the majority of cases are thought to occur when the girl is between the ages of 5 and 8 years old. Staff and volunteers need to be alert to the possibility of a girl being at risk of or already having suffered FGM. They should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Specific factors, in addition to a girl's community, which may heighten a girl's risk of being affected by Female Genital Mutilation (FGM) include:

- The position of the family and the level of integration within UK society – it is believed that communities less integrated into British society are more likely to carry out FGM;
- Other family members who have been subjected to FGM;
- The level of awareness of the girl about her body and rights.

The girl may be taken to her country of origin, particularly during the longer summer holidays, or FGM may be carried out in this country. After FGM, a girl may have difficulty walking, sitting or standing; she may have problems urinating and require longer times in the bathroom.

NB Whilst all staff should speak to the DSL about any concerns regarding FGM, there is a specific **legal** duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of female genital mutilation (FGM) appears to have been carried out on a girl under the age of 18, the teacher **must** report this personally to the police.

(NB It will be rare for teachers to see visual evidence, and they should not be examining pupils). The HM Government document 'Multi-agency statutory guidance on FGM, the Home Office document 'Mandatory Reporting of Female Genital Mutilation – procedural information' and the FGM Fact Sheet provide more information; links to all three documents can be found at Annex 2 of this policy.

**Preventing Radicalisation:** The Counter Terrorism and Security Act 2015 places a duty on specified authorities, including education providers, to have regard to the need to prevent children, young people and adults from being drawn in to terrorism or extremist views (the 'Prevent' Duty). Staff and volunteers should help protect children from extremist and violent attitudes in the same way that they help to safeguard children from drugs, inappropriate relationships or alcohol.

**Extremism** is the vocal or active opposition to our Fundamental Values, including the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people. As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection.

Some indications that a person is being or has been radicalised are outlined in Appendix 1 of this document. Where radicalisation is suspected, the appropriate lead on 'Prevent' should be informed in order that s/he may consult with the local 'Prevent' and/or 'Channel' team. Further details are outlined in Appendix 1 of this document, including contact numbers for immediate referral.

School staff should understand when it is appropriate to make a referral to the Channel programme, which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

**Trafficking and Slavery:** The Modern Slavery Act 2015 consolidates current offences of trafficking and slavery. Trafficking of persons means the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Children are trafficked for many reasons, including sexual exploitation, domestic servitude, labour exploitation, criminal exploitation e.g. benefit fraud and involvement in criminal activity such as pick-pocketing, theft and working in cannabis farms. They may also be involved in organ harvesting.

**Peer on Peer Abuse:** Children can abuse other children in a number of ways, including (but not limited to) bullying, cyberbullying, sexual violence or harassment, physical abuse, sexting, hazing/ initiation rites. In the event of disclosures about peer on peer abuse, all children involved, whether perpetrator(s) or victim(s), will be treated as being potentially 'at risk'. A bullying or sexting incident for example will be treated as a child protection concern when there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm'. **Sexual violence and sexual harassment** can occur between two or more children of any age. Violence and harassment exist in a continuum and may overlap; they can be on or off line. Girls, children with SEND or LGBT children are at greatest risk. All staff must make it clear at all times that sexual violence and harassment are not acceptable; they must not be tolerated as 'part of growing up' or 'boys will be boys'. All such behaviours must be challenged and dealt with, so that they are not 'normalised'. Sexual violence includes rape, assault by penetration, sexual assault (i.e. if a person intentionally touches another person in a sexual way and the person touched has not freely consented to such touching and/or is not capable of giving such consent). Sexual harassment includes sexual comments/ jokes, online behaviour such as the non-consensual sharing of images, unwanted sexual comments, or sexual exploitation/ threats. In the event of peer on peer abuse, the perpetrator and victim will receive support from the DSL or Deputy DSL at the School, although depending on the circumstances a pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation of such allegations and the appropriate school or setting's anti bullying policy, Behaviour and discipline policies, including sanctions, will apply. Allegations of peer on peer abuse will be recorded by the relevant DSL and will normally be investigated by her or her Deputy.

**Forced Marriage:** A forced marriage is a crime in England. It is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they're bringing shame on their family). Financial abuse (taking your wages or not giving you any money) can also be a factor. The Forced Marriage Unit help line can be found in Annex 4 of this document.

**Child Missing from Education (CME):** A child going missing from education (particularly repeatedly) is a potential indicator of abuse or neglect (including sexual and/or criminal exploitation), mental health needs, risk of substance abuse, risk of travelling to conflict zones/ risk of FGM/ risk of forced marriage. All staff should be alert to the risk of children in their immediate care going missing from education, particularly on repeat occasions, and alert the relevant Designated Safeguarding Lead or Deputy DSL to any concerns which they have.

The Designated Safeguarding Lead of each School must inform Bolton Local Authority of any pupil who is going to be deleted from the admission register if the child: has been taken out of school by his/her parents and is being educated outside the school system e.g. home education; has ceased to attend

school and no longer lives within reasonable distance of Bolton School; has been certified by the School Medical Officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age; is in custody for a period of more than four months due to a final court order and the School does not reasonably believe they will be returning at the end of that period; or, has been permanently excluded. This should be done as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the register.

In addition, the DSL of each School must inform Bolton Local Authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more. NB Individual schools and settings within the Foundation have separate policies and/or guidance on what to do if a child goes missing or is not collected on time

**Children with Family Members in Prison:** Such children are at risk of poor outcomes including poverty, stigma, isolation, and poor mental health.

### **Section B: What you should do if you have concerns about a child in need or at risk**

If you have concerns of any nature about a child's welfare, you must pass these on immediately, even if you are not entirely sure of your grounds for concern.

The normal procedure is to speak without delay to the appropriate Designated Safeguarding Lead (DSL) or their Deputy within the Foundation. Options will then include: a) managing any support for the child internally via the School's/ setting's pastoral support processes; b) an Early Help assessment; or c) a referral for statutory services, for example as the child might be in need, is in need, is suffering or is likely to suffer harm. Parental consent is not required for referral to statutory agencies.

The DSL or Deputy should always be available to discuss safeguarding concerns. If, in exceptional circumstances, s/he is not available, *do not allow this to delay appropriate action from being taken*. Speak to another member of the Senior Leadership Team or take advice from local children's social care and inform the DSL as soon as is practically possible.

In particular, if there is a risk of *immediate serious harm* to a child and it is not possible to report to the DSL, then **you yourself** should make a referral to Social Care immediately: **Anyone can make a referral**. You will find the relevant contact details on the final page of the main document. You must then inform the Designated Safeguarding Lead, Headteacher, or other senior member of staff as soon as possible. (For concerns about radicalisation, see Appendix 1 for contact details).

It is important to act on and refer signs of abuse or neglect at the earliest opportunity so that risks are addressed, early help is provided and issues are prevented from escalating. If a situation does not improve, you are required to demand that your concerns are reassessed and to challenge inaction.

#### **The Designated Safeguarding Leads and Deputies within the Foundation are as follows:**

Senior Boys' School: Mrs Helen Brandon, Deputy Head, on 01204 840201 extension 211, [HMB@boltonschool.org](mailto:HMB@boltonschool.org), or (Deputy DSL) Mr Karsten Hiepko, Assistant Head, on 01204 840201 extension 203, [KMH@boltonschool.org](mailto:KMH@boltonschool.org) or (Deputy DSL) Mr Paul Davidson on 01204 840201 extension 253, [PGD@boltonschool.org](mailto:PGD@boltonschool.org), or (Deputy DSL) Ms Louise Waller on 01204 840201 extension 236, [clw@boltonschool.org](mailto:clw@boltonschool.org). Mrs Brandon is the designated teacher responsible for promoting the educational achievement of children in the Boys' Division who are looked after and for keeping them safe. Mrs Brandon is the 'Prevent' Lead.

Senior Girls' School: Mrs Lynne Kyle, Deputy Headmistress, on 01204 840201 extension 214, [lkyle@boltonschool.org](mailto:lkyle@boltonschool.org), or (Deputy DSL) Mrs Catherine Winder, Head of Sixth Form, on 01204 840201 extension 361, [cwinder@boltonschool.org](mailto:cwinder@boltonschool.org). Mrs Kyle is also the designated teacher responsible for promoting the educational achievement of children in the Girls' Division who are looked after and for keeping them safe. Mrs Kyle is the 'Prevent' Lead.

Junior Boys' School: Mrs Susan Faulkner, Headteacher, on 01204 840201 extension 397, [SF@boltonschool.org](mailto:SF@boltonschool.org) or (Deputy DSL) Mr Fergus Morris, Deputy Head, on 01204 840201 extension 395, [FM@boltonschool.org](mailto:FM@boltonschool.org). Mrs Faulkner is the 'Prevent' Lead.

Junior Girls' School: Mrs Carol Laverick, Headteacher, on 01204 840201 extension 414, [claverick@boltonschool.org](mailto:claverick@boltonschool.org) or (Deputy DSL) Mrs Helen Holt, Deputy Head, on 01204 840201 extension 545 or 540, [hholt@boltonschool.org](mailto:hholt@boltonschool.org). Mrs Laverick is the 'Prevent' Lead.

Beech House Infant School, including Early Years Foundation Stage (EYFS): Mrs Tracey Taylor, Head of Beech House on 01204 840201 extension 270, [tataylor@boltonschool.org](mailto:tataylor@boltonschool.org), or (Deputy DSL) Mrs Jane Mees, Deputy Head of Beech House on 01204 840201 extension 501, [jmees@boltonschool.org](mailto:jmees@boltonschool.org). Mrs Taylor is the 'Prevent' Lead.

Nursery, (Early Years Foundation Stage): Mrs Angela Smith, Deputy Nursery Manager, on 01204 840201 extension 520, [Asmith@boltonschool.org](mailto:Asmith@boltonschool.org) or (Deputy DSL) Mrs Tracey Taylor, Head of Beech House on 01204 840201 extension 270, [tataylor@boltonschool.org](mailto:tataylor@boltonschool.org). Mrs Smith is the 'Prevent' Lead.

Kidzone, including Early Years Foundation Stage: Mrs Laura Smith, Kidzone Manager, on 01204 840201 extension 531, [LESmith@boltonschool.org](mailto:LESmith@boltonschool.org). In the event that Mrs Smith is not available, Mrs Pauline Palmer, Deputy Kidzone Manager, (Deputy DSL) should be contacted on 01204 840201 extension 532, [ppalmer@kidzone.uk.com](mailto:ppalmer@kidzone.uk.com). Mrs Smith is also the designated person responsible for promoting the educational achievement of children in Kidzone who are looked after and for keeping them safe, and is the 'Prevent' Lead.

Central Services and BSSL Staff, other than those working at Patterdale Hall, who have concerns about a child should raise the matter with the relevant Designated Safeguarding Lead, (or their Deputy) named above, or during school holidays with Mrs Cathy Fox, Clerk and Treasurer, on 01204 840201 extension 205, [clf@boltonschool.org](mailto:clf@boltonschool.org) or in the event that Mrs Fox is not available during school holidays with Mr Martin McDermott, Services Bursar, on 01204 840201 extension 418, [mmcdermott@boltonschool.org](mailto:mmcdermott@boltonschool.org). Mrs Fox is the 'Prevent' Lead.

Patterdale Hall staff with concerns about a pupil from Bolton School should inform Mr Tim Taylor, Manager, or Mr Sean Duffy, Residential Manager at Patterdale Hall, on 01768 482233 or speed dial 459 from School, [ttaylor@patterdalehall.org.uk](mailto:ttaylor@patterdalehall.org.uk) or [sduffy@patterdalehall.org.uk](mailto:sduffy@patterdalehall.org.uk). Mr Tim Taylor, Manager, or Mr Sean Duffy, Residential Manager at Patterdale Hall or the Bolton School member of staff in charge of the group will then inform the relevant Designated Safeguarding Lead at School. Mr Tim Taylor is the Prevent Lead.

Patterdale Hall staff with concerns about a child or young person who is **not** from Bolton School should inform Tim Taylor, Manager, or Sean Duffy Residential Manager at Patterdale Hall on 01768 482233 or speed dial 459 from School. They will liaise with the accompanying teacher/member of staff so that the accompanying teacher/member of staff can deal with the matter in line with his/her own institution's procedures. In such circumstances, the Patterdale Hall Manager/ Residential Manager will also inform the Services Bursar, Mr Martin McDermott or, in his absence, the Headmaster or the Headmistress.

NB: Any member of staff (regardless of where in the organisation they work) should first raise the concern with the relevant Designated Safeguarding Lead (or their Deputy) in that part of the School or Foundation named above. If that is not relevant (e.g. due to the concern not being about a Bolton School pupil) or not possible if the DSL or Deputy DSL are unavailable (e.g. during out of hours or school holidays), then the member of staff should ring social services directly themselves using the contact details shown in Annex 5.

### **What Happens Next?**

If Early Help is appropriate, the DSL (or deputy) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse. (See Annex 3 and 4 for Bolton procedures)

**Where a child is suffering or is likely to suffer from harm, it is important that a referral to children's social care (and, if appropriate, the police\*) is made immediately.** Referrals should follow the local authority's referral process. Referrals are normally to Bolton or, if advised by Bolton, to the area in which the child lives. (See Annex 3 and 4 for Bolton procedures). The online tool 'Report child abuse to local council' <https://www.gov.uk/report-child-abuse-to-local-council> directs to the relevant local children's social care contact number. (\*NB Concerns will be referred to the Police if a child is in urgent danger, for example if a pupil is thought to be at immediate risk because of a family member's violence/ intoxication/ substance abuse/ mental illness or threats to remove the child during the school day.)

The local authority should make a decision within one working day of a referral being made about the type of response required and should let the referrer know the outcome. This will include determining whether:

- the child requires immediate protection and urgent action is required;
- whether the child is in need, and should be assessed under section 17;
- there is reasonable cause to suspect the child is suffering, or likely to suffer, significant harm, and whether enquiries must be made and the child assessed under section 47;
- any services required by the child and family and what type of services; and
- further specialist assessments are required in order to help the local authority to decide what further action to take.

NB. School/ Setting staff should follow up on a referral if this information is not forthcoming. If a statutory assessment is required, they should support that assessment. If, after a referral, the child's situation does not appear to be improving, the referrer should consider following local escalations procedures to ensure the child's situation improves.

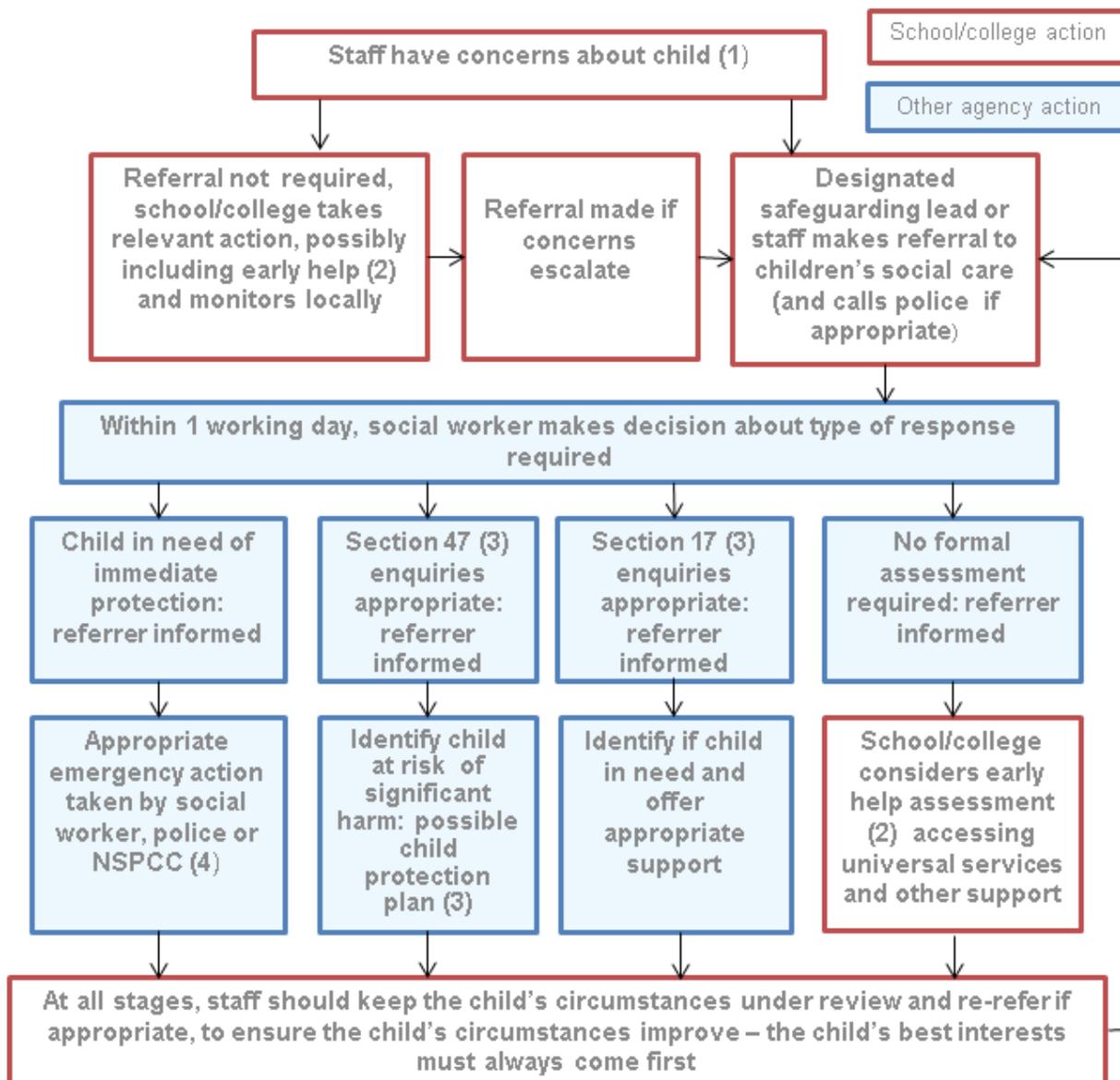
All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy).

Social Care staff may decide to begin a child protection investigation, in which case their procedures will apply. In either case the child's wishes or feelings will be taken into account when determining what action to take and what services to provide to protect the child by ensuring there are systems in place for the child to express their views and give feedback.

In the course of an investigation, Social Care Staff or the Police may wish to speak to a child, without parental knowledge or consent. The Headmaster, Headmistress, Clerk and Treasurer, or their deputy, acting 'in loco parentis', will have discretion to agree to this in order to allow the authorities to explore concerns and determine whether there are grounds for further action. In these cases the Headmaster or

Headmistress, Clerk and Treasurer or their deputy will ensure that the child's welfare is secured and that they have access to a trusted adult. (NB: The Headmaster/Headmistress/ Clerk and Treasurer or their deputy will not allow a child to be removed from School premises without either parental consent; an order of the Court, Emergency Protection Order, Interim Care Order or Police Protection Order; or the child's own consent (providing the child is of an age and understanding to give informed consent)).

**Actions Where There are Concerns About a Child (from KCSIE September 2018)**



**Why is all of the above important?**

It is important for children to receive the right help at the right time to address risks and prevent issues escalating. Research and serious case reviews have repeatedly shown the dangers of failing to take effective action. Examples of this poor practice include: failing to act on and refer the early signs of abuse and neglect; poor record keeping; failing to listen to the views of the child; failing to re-assess concerns when situations do not improve; sharing information too slowly and a lack of challenge to those who appear not to be taking action.

## **Section C: Allegations Against Staff/ Volunteers/Contractors/Others; Staff Behaviour, Recruitment & Training**

### **What must happen if you have a concern about a member of staff's/ volunteer's behaviour/ attitudes**

The Foundation has a responsibility to follow guidance set out in KCSIE September 2018 when managing cases of allegations against a current member of staff or volunteer that might indicate that the person in question would pose a risk of harm if they continued to work in regular or close contact with children in their present or any other capacity. The guidance will be used regardless of whether the alleged abuse took place within the Foundation. (Allegations against a former member of staff or historical allegations of abuse will be referred to the police).

If a member of staff has any concern about a colleague's or volunteer's behaviour or attitudes, s/he must pass it on to an appropriate, more senior colleague. If the concern suggests that a member of staff or volunteer has:

- a) behaved in a way that has harmed a child or may have harmed a child;
  - b) possibly committed a criminal offence against a child or related to a child;
  - c) behaved towards a child or children in a way that indicated s/he may pose a risk of harm to children;
- then the concern must be passed on as follows, without informing the person involved in the allegation:

- For a concern about a member of support staff, Nursery Nurse, teacher or the Designated Senior Lead or Deputy Designated Senior Lead in the Girls' Division (including the Nursery): report the matter to the Headmistress, Miss Sue Hincks, on extension 212/ [shincks@boltonschool.org.uk](mailto:shincks@boltonschool.org.uk) /mobile phone number out of hours: 07557 747005;
- For a concern about a member of support staff, teacher or the Designated Senior Lead or Deputy Designated Senior Lead in the Boys' Division: report the matter to the Headmaster, Mr Philip Britton, on extension 204/ [pjb@boltonschool.org.uk](mailto:pjb@boltonschool.org.uk) / 07824 645810
- For a concern about a member of Central Services or BSSL staff: report the matter to the Clerk and Treasurer, Mrs Cathy Fox, on extension 205/ [clfox@boltonschool.org.uk](mailto:clfox@boltonschool.org.uk) / 07557 747004;
- For a concern about the Clerk and Treasurer, the Headmaster or Headmistress: report to the Chairman of Governors, Mr Michael Griffiths (or the Vice Chair, [Mr David Mohyuddin for the Boys' Division and Dr Sheila Fisher for the Girls' Division] in his absence), without informing the Clerk and Treasurer, Headmaster or Headmistress. Contact details for the Chairman and the two Vice Chairs may be obtained by telephoning Mrs Debra Hardman, P.A. to the Clerk and Treasurer, on 01204 840201 extension 411.
- For a concern about the Chairman of Governors: report to the Local Authority Designated Officer, without first informing the Chairman of Governors.

Full details of the School's policy and procedures to follow in these circumstances can be found in a separate document, 'Dealing with Allegations of Abuse against Staff, Volunteers, Contractors and Other Adults', and in the Department for Education's (DfE) guidance publication "Keeping Children Safe in Education", September 2018. The Foundation's Allegations of Abuse Policy also explains when to refer to DBS (the Disclosure and Barring Service) and/or when to refer to the Teacher Regulation Agency (TRA) as well as how to inform Ofsted (about allegations against people living/ working on the premises or of any other abuse alleged to have taken place on the premises within 14 days at the latest).

### **Staff/ Volunteers' Behaviour**

All staff, paid and unpaid, and volunteers are expected to adhere to The Behaviour Policy for Staff, Volunteers, Contractors and Other Adults in respect of their contact with pupils and families. This policy includes guidance on staff/pupil relationships and communication, including the use of technology and

social media, and working in one-to-one situations with children and young people among other potentially difficult issues. There is also additional guidance in the Employee Handbook and the separate handbooks and policies for the different schools and settings, for example about changing arrangements in the Infants' School, Nursery and Kidzone.

Members of staff, volunteers or contractors working in the Early Years Settings must not take images other than on school equipment and when authorized to do so for educational purposes by their line manager. Images taken must be stored securely on school equipment at all times. Staff members may not take home any device which has an image of a child on it. Images are deleted from school equipment as soon as they are no longer required for educational purposes.

Contractors, volunteers and visitors are not allowed to take images in the Nursery (including the Nursery Class), Kidzone, or Beech House, unless given specific authorization by the Setting Manager (or her Deputy) or the Headteacher/Services Bursar. Members of staff, volunteers (including Sixth Form volunteers), contractors and visitors (other than parents) are required to ensure that they do not have their own phone on their person when in an EYFS setting. Parents are not asked to leave their phone, but are reminded during performances or other activities that they must not video or take pictures of other people's children without the parents' permission.

### Physical Contact with Pupils

Whilst it would be unrealistic and undesirable to ban all physical contact between adults and children, staff and volunteers are expected to exercise caution and to avoid placing themselves in a position where their actions might be open to criticism or misinterpretation. Any physical contact adults have with children must be both appropriate and proportionate to the circumstances. Where an incident occurs which might be misconstrued or in the exceptional circumstances where it becomes necessary for a member of the teaching staff or an appropriate member of support staff to use 'reasonable force' to restrain a child or young person for their own protection or for others' safety, this will be appropriately recorded and reported to the relevant Headteacher or Nursery/ Kidzone Manager, in accordance with the Staff Behaviour Policy, the Employee Handbook and the separate handbooks and policies for the different schools/ Nursery/ Kidzone.

Reasonable Force means 'using no more force than is needed' and may involve passive physical contact (e.g. standing between pupils or blocking a pupil's path) or active physical contact (e.g. leading a pupil by the arm out of the classroom.) When using reasonable force in response to risks presented by incidents involving children with SEN or disabilities or with medical conditions, the additional vulnerability of these children must be considered. The Protocols for Restraining a Child and for Searching a Child Without Parental Consent (including more vulnerable children) can be found at the end of the Allegations of Abuse Against Staff, Volunteers, Contractors and Other Adults Policy.

The administration of corporal punishment to a child during any activity, whether or not within the Foundation's premises, is strictly prohibited.

Separate policies outline recommended practices with regard to first aid, personal care, medical care and attention and these policies should be consulted to help safeguard children requiring such interventions.

### Sexual Offences Act and Those in a Position of Trust or Authority

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children are in positions of trust in relation to the children in their care. Broadly speaking, a relationship of trust can be described as one in which one party is in a position of power or influence over the other by virtue of their work or the nature of their activity. It is vital for all those in positions of trust to understand

the power this can give them over those they care for and the responsibility they must exercise as a consequence of this relationship so that they do not breach this trust.

A relationship between an adult and a child cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people. Colleagues have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Similarly, they have a duty to ensure that relationships between adults and children are conducted on the basis of mutual respect.

Any person working in the Foundation is made aware that, under the Sexual Offences Act 2003, it is an offence for a person over 18 (e.g. teacher, or any other member of staff or volunteer) to have a sexual relationship with a child or young person under 18 where the employee/volunteer is in a position of trust or authority in respect of that child, even if the relationship is consensual. This applies where the child is in full-time education and the person works or volunteers in the same establishment as the child, even if they do not teach the child. It also applies in situations where the child or young person has used the facilities of the Foundation, for example Patterdale Hall, and where the member of staff or volunteers is, or has been, in a position of trust in respect of that child; again, even if the relationship is consensual.

### **Staff/ Volunteers' Suitability including regulated activity, supervision, and checks regarding work experience, homestays**

Bolton School ensures that all persons, including paid staff, volunteers and contractors, undergo a rigorous checking process before they are allowed to commence work at the Foundation. The Foundation's Safer Recruitment and Selection Policy and Procedure, written in line with the guidance contained in the document 'Keeping Children Safe in Education' (September 2018), will be followed.

Where staff are engaged in regulated activity (i.e. the majority of staff), an enhanced DBS certificate which includes barred list information is required. (Regulated activity means that paid staff are responsible on a regular basis for teaching, training, instructing, caring for or supervising children or that they work regularly in a school where that work provides an opportunity for contact with children. For unpaid staff/volunteers, it means that they work regularly in the school in such a way that they may have unsupervised contact with children. Regulated activity also includes any adult who engages in intimate or personal care or overnight activity, even if this happens only once. Personal care includes helping a child with eating, drinking, toileting, washing, bathing and dressing. Regulated activity also includes health care under the supervision or direction of a health care professional.) **It is an offence for the school to allow a barred individual to carry out any form of regulated activity and for a barred individual to attempt to engage or to engage in such work.**

For all other staff who have an opportunity for regular contact with children but who are not engaged in regulated activity, an enhanced DBS certificate *without* a barred list check is appropriate. A **supervised** volunteer who regularly teaches or looks after children is not in regulated activity although an enhanced DBS check may be carried out.

In addition to the DBS certificate, any member of staff who is appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching and, for those involved in management roles, such as Heads of Department, an additional check is required to ensure they are not prohibited from participating in the management of an independent school (Section 128, Education & Skills Act 2008).

In cases where the school's pupils are being supervised on a site other than the school, assurance is gained that staff of the other organisation have been checked for suitability, and in doing so account is taken of the nature, age range and any other significant features of the school in provision for safeguarding.

Sometimes work which would be a regulated activity if unsupervised is, instead, supervised. In such cases, the supervision must be by a person who is in regulated activity; the supervision must be regular and day to day; the supervision must be 'reasonable in all the circumstances to ensure the protection of the children', taking in to account the age(s) of the children, the number of children, whether or not other workers are around, the nature of the work, the vulnerability of the children, and how many people would be supervised by each supervising person.

When organising work experience, School will ensure the placement provider has policies and procedures in place to protect children from harm.

When arranging a homestay, School will consider the suitability of the adults in the respective families who will be responsible for the visiting child during the stay. During this time, these adults will be engaging in regulated activity. As the regulated activity provider, the School would be committing a criminal offence if it allowed a person barred by the DBS to carry out a regulated activity. Therefore, School will obtain a DBS enhanced certificate with barred list information, with the 'Position Applied for' making it clear that the hosts are volunteers. With regard to the situation abroad, School will use its professional judgement to satisfy itself that the arrangements are appropriate and sufficient to safeguard every child who will take part in the Exchange. Pupils will be instructed how to contact should an emergency occur or a situation arise which makes them feel uncomfortable. (A period lasting 28 days or more may amount to private fostering; in such cases, the LA must be informed.)

In recruiting staff who will be engaged in one-to-one teaching, individual coaching, or tuition, attention will be given during interview to a candidate's awareness of the potential sensitivities of any situation in which they may find themselves which are in addition to those of a member of staff engaged in whole-class tuition.

In the EYFS settings, there are effective systems in place to ensure that practitioners and any person who is likely to have regular contact with children are suitable. People whose suitability has not been checked, including through a criminal records check, are not allowed to have unsupervised contact with children being cared for in the EYFS settings. All staff, including those in the EYFS settings and those who directly manage these settings, are reminded every year that they are expected to disclose any convictions, cautions, court orders, reprimands and warnings which may affect their suitability to work with children. Ofsted is notified of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided, including disqualification.

### **Staff Training in Safeguarding including at Induction**

Induction Safeguarding Training must include: the Foundation's Safeguarding & Child Protection procedures and policy; on-line safety; the role and identity of the DSL(s) and deputy; KCSIE part one (all staff); KCSIE Annex A (leaders and those who work directly with children); the pupil behaviour policy in the relevant School/ setting; the Child Missing in Education Policy in the relevant School/ setting; the Behaviour Policy for Staff, Volunteers, Contractors and Other Adults.

Safeguarding training so that all staff understand and discharge their role and responsibilities in this area is a mandatory element of the induction programme for all new staff and volunteers, including peripatetic teachers, coaches, invigilators, trainees or pupils paid to work at the school (for example as after-school carers). New staff and volunteers joining in September take part in the annual training (see below) and are inducted in to this Policy. At other times of the year staff and volunteers who will work closely with children in an unsupervised manner (including all teachers) are required to undertake the LA's online training, which can be found at <https://boltoncouncilwebteam.co.uk/onlinecourses/>, preferably before they commence their duties and definitely within the first two days of service. They will also be inducted

in to this Policy by one of the DSLs. Other staff, who do not have unsupervised direct contact with children will have the same training within the first five days of service, if they haven't completed it prior to starting work. All new staff are also expected to read, (and implement the provisions of), the Behaviour Policy for Staff, Volunteers, Contractors and Other Adults, the Whistleblowing Policy, Part One of Keeping Children Safe in Education and to sign to confirm that they have done this.

Temporary staff and volunteers will be provided with induction training that includes child protection and safeguarding and they will be inducted in to the school's arrangements and this Policy. They will also be required to read the School's Behaviour Policy for Staff, Volunteers, Contractors and Other Adults and Keeping Children Safe in Education - Part One and to sign to confirm they have done this.

The training of staff working in the EYFS settings meets the requirements and includes information about emergency evacuation procedures, the equality policy and health and safety issues, in addition to safeguarding and child protection.

It is the responsibility of the individual's line manager to ensure that induction training happens in a timely manner and that the relevant information and certificate, (if appropriate) is sent to the Personnel Department so that the details can be recorded by them.

The Designated Safeguarding Lead and any deputies will undergo inter-agency training to provide them with the knowledge and skills required to carry out the role. The training will be updated at least every two years. In addition to their formal training, as set out above, their knowledge and skills will be updated, (for example via e-bulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments), at regular intervals, but at least annually, to keep up with any developments relevant to their role.

In order to comply with the Bolton Safeguarding Partner's recommendations every member of staff and volunteer receives updated Child Protection training **at least once every three years** in order to equip them with the knowledge and skills necessary to carry out their responsibilities. In addition, all staff members will receive safeguarding and child protection updates, via email and staff meetings, as required and at least annually, to provide them with the relevant skills and knowledge to understand and discharge their role to safeguard children effectively. Each September, an in-house training session is delivered by one of the DSLs, or an external trainer to a section of the School which may also be attended by any new staff or volunteer joining in September (unless they have already been trained prior to taking up their post). This training enables staff to identify signs of the different types of possible abuse and neglect at the earliest opportunity, and to respond in a timely and appropriate way. In addition, staff are made aware of updates to legislation and guidance in this area. They are also trained in inter-agency work. In addition to regular updates and training when updates are published locally or nationally, more formal and substantial training takes part as follows in the next cycle: September 2018 - Girls' Division (including Beech House and Nursery Class), September 2019 - Boys' Division, and September 2020 - Central Services and BSSL.

A confidential staff care scheme is also available for staff affected by high level child protection issues.

#### **Section D: How the Foundation Supports the Welfare of the Child in Everyday Situations**

The Bolton School Foundation takes seriously its duty of pastoral care and is proactive in seeking to prevent children becoming the victims of abuse, neglect or exploitation. It does this in a number of ways:

- By ensuring that the Safeguarding and protection of children in the Foundation are the active responsibility of the whole community, and that those responsible for taking action make sure their approach is child-centred, acting always in the best interests of the child;

- By the Governors ensuring that there is in place an effective Safeguarding/ Child Protection Policy in line with the guidance and procedures of the Local Safeguarding Children Board, whose arrangements are fully implemented in practice and reviewed at least annually;
- By the Governors ensuring that an appropriate senior member of staff from the leadership team is the DSL;
- By ensuring that people looking after children are suitable, including in the EYFS settings, and that 'Safer Recruitment' Policy and Procedures help deter, reject or identify people who might abuse children e.g. making appropriate pre-appointment checks when appointing members of staff/ volunteers/ contractors/ supply staff in accordance with national requirements (KCSIE September 2018), including checking that those working in early and later years child care are not disqualified from working in childcare;
- By ensuring that Induction processes for staff include training in the Safeguarding & Child Protection Policy; online safety; the Pupil Behaviour Policy for the relevant School/setting; the Behaviour Policy for Staff, Volunteers, Contractors and Other Adults; the safeguarding response to children who go missing from education; the role of the DSL and any Deputies;
- By putting in place appropriate safeguarding responses to children who go missing from education, including providing information to local authorities when a child leaves the Foundation;
- By notifying the LA if the School knows of or becomes aware of private fostering arrangements;
- Through the creation of an open culture which respects all individuals' rights and discourages bullying and discrimination of all kinds, supported by a Whistle blowing Policy which details procedures for individuals to report concerns;
- By informing children of their rights to be free from harm, and encouraging them to talk to staff if they have any concerns;
- By reassuring and responding proactively to any report of sexual violence and sexual harassment;
- By helping children and young people within the School/ setting to keep themselves safe, including on-line, through programmes of Personal, Social, Health, and Economic Education at an age-appropriate level, to promote self-esteem and social inclusion;
- By using assemblies and curriculum time where appropriate to help children understand the risks posed by those who use the internet and social media to bully, groom or abuse other people;
- By training all staff in aspects of Safeguarding and Child Protection, including: how to look out for signs of abuse and neglect, particularly in children who are too young to voice their concerns; how to identify children or young people at risk of radicalisation; and how to promote e-safety among children and young people;
- By adopting robust systems which deter possible abusers and will manage effectively any allegations or concerns about abuse if they arise;
- By sharing information as appropriate with other professionals and local agencies;
- By ensuring appropriate staff have the information they need in relation to a child's looked after legal status, including details of the child's social worker and 'virtual head';
- By ensuring that the DSL has details of the Personal Adviser appointed to guide and support care leavers;
- By working proactively to fulfil its duties with regard to the Prevent Strategy;
- By adopting robust e-safety policies and procedures with appropriate filters and monitoring systems in place.
- By limiting and/or banning pupils' access to mobile 'phones during the school day, in accordance with each School's rules and regulations;
- By following all local and national guidance with regard to children in the EYFS settings, e.g. ensuring that Bolton Council and Ofsted would be informed of any serious accident, serious illness, serious injury to or the death of any child within our care and of the actions taken within 14 days were such an event to happen;
- By notifying Ofsted and Bolton Council Environmental Health Team of any food poisoning affecting two or more children cared for on the premises in any EYFS setting, should such an event occur.

## How are Safeguarding and Child Protection Procedures Reviewed in the Foundation?

At the conclusion of a case the Local Authority's **Safeguarding in Education Officer will review the circumstances** of the case with the Headmaster, Headmistress, Clerk and Treasurer or Chairman of Governors as appropriate, or their deputies to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.

The Governors have nominated one Governor, Judge Louise Relph, to assist all Governors in carrying out their responsibilities for Child Protection matters. Louise's contact details may be obtained by telephoning Mrs Debra Hardman, P.A. to the Clerk and Treasurer, on 01204 840201 extension 411. The role of the Safeguarding Governor includes liaising with the Local Safeguarding Children's Board and other agencies. Louise, along with the Designated Safeguarding Leads and Headmaster and Headmistress **undertakes a formal annual review** of the School's policy and procedures relating to Safeguarding and Child Protection, and how the duties of those responsible have been discharged, and brings to the Governing Body any major issues arising from the review, including any proposed changes in relation to the child protection procedure. The most recent review was undertaken on 24th May 2018 and this was discussed and minuted at the Governing Body Meeting held on 6<sup>th</sup> July 2018. Normally, the full Safeguarding Policy is also reviewed at this summer meeting. However, this year, a substantial review was due to take place over the summer holiday. This Safeguarding Policy (i.e. substantially re-written and with KCSIE 2018 updates) was therefore reviewed by the Executive Committee of the Governing Body on August 15<sup>th</sup> 2018 and sent out to all Governors thereafter. A review of this Safeguarding Policy by the Full Governing Body took place in October 2018.

Following the conclusion of a case or the Governors' review of Safeguarding and Child Protection Procedures, the Governors and in particular the nominated Governor for Child Protection, along with members of the Executive Committee, will ensure that any deficiencies or weaknesses in the training provided for staff or in the School's procedures will be remedied without delay.

## **Annex 1: Role and Responsibilities of the Designated Safeguarding Lead for Child Protection**

The Senior Officers on behalf of the Governing Body ensure that the Foundation designates appropriate senior members of staff to take lead responsibility for Safeguarding and Child Protection. These people have the status and authority within their respective schools and within the Foundation to carry out the duties of the post, including committing resources and, where appropriate, supporting and directing other staff, and taking part in strategy discussions and inter-agency meetings.

The Designated Safeguarding Leads have one or more Deputy Designated Safeguarding lead(s) who are trained to the same standard as the Designated Safeguarding lead. The activities of the Designated Safeguarding lead can be delegated to appropriately trained deputies, but the ultimate **lead responsibility** for child protection, as set out above, remains with the Designated Safeguarding lead; this **lead responsibility cannot** be delegated.

The broad areas of responsibility for the Designated Safeguarding Lead are to:

### Manage Referrals

- Refer cases of suspected abuse to the local authority children's social care as required;

The DSL will refer all cases of suspected abuse to the relevant Local Authority Children's Services Social Care ***within 24 hours of a disclosure or suspicion of abuse***. If the child is in immediate danger, the police will be notified as they alone have the power to remove a child to a place of safety without recourse to courts.

Referrals should be made to the Children's Services, Social Care as early in the day as possible to allow a co-ordinated and considered response. Referrals should be made by telephone and are then normally followed up in writing using the Early Help Form within two working days. *It is the responsibility of the Designated Safeguarding Lead to ensure that appropriate advice is obtained from the Children's Services, Social Care Department and that the relevant paperwork is completed.* The assessment process is documented on page 22 of The Bolton Safeguarding Partner's Framework for Action and Early Help Framework, which can be found at the link below: [\\consus\bs-shared\\$\Central Services Shared Documents\CS Personnel\Policies and Procedures](#). The DSL should complete the Early Help Assessment and Action Plan Form which can be found by following the same link.

The DSL should also:

- Support staff who make referrals to local authority children's social care;
- Refer cases to the Channel programme where there is a radicalisation concern as required, and support staff who make referrals to the Channel programme;
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service;
- Refer cases where a crime may have been committed to the Police or work in partnership with local prevent coordinators to prevent people from being drawn into terrorism;

### Work with Others

- Liaise with the Heads to inform them of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- As required, liaise with the case manager and the designated officer at the local authority for child protection concerns in cases which concern a staff member;

- Liaise with staff (especially pastoral staff, school nurses, IT technicians and SENCOS or their equivalent in each school/ setting) on matters of safety and safeguarding (including online and digital safety);
- Liaise with relevant agencies when deciding to make a referral;
- Liaise with colleagues and the relevant Headteacher/ Headmaster/ Headmistress as appropriate to ensure that pastoral and other policies and procedures in place are sufficiently robust to support safeguarding and child protection with particular regard to on-line safety, peer on peer abuse, sexual harassment and any local issues which emerge;
- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding as well as the Prevent Strategy;
- In cases involving the Early Years Foundation Stage, including Beech House, the Nursery or Kidzone, Ofsted must be informed of any allegations of serious harm or abuse by any person working or looking after children at the premises (whether that allegation relates to harm or abuse committed on the premises or elsewhere), or any other abuse which is alleged to have taken place on the premises, and of the action taken in respect of the allegations. This will be done, as soon as is reasonably practicable, but at the latest within 14 days of a disclosure or suspicion of abuse.

### Undertake Training

The Designated Safeguarding Lead, and Deputies undergo appropriate training in child protection and inter agency working (provided by the local social services department in Bolton or an external agency acceptable to the Bolton Safeguarding Partners) to provide them with the knowledge and skills they need to carry out the role and in line with Annex B of KCSIE 2018. This training is updated at least every two years in order to allow the DSL and Deputy DSL to do the following:

- Understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- Be aware of any local issues regarding Child Protection (e.g. gangs, grooming, local communities in which FGM and/or forced marriage is a potential risk)
- Ensure each member of staff has access to and understands the Foundation's Safeguarding and Child Protection Policy and Procedures, especially new, temporary and part time staff;
- Be alert to the specific needs of children in need, those with special educational needs and disabilities and young carers;
- Be able to keep detailed, accurate, secure written records of concerns and referrals;
- Understand and support the school with regards to the requirements of the Prevent duty and be able to provide advice and support to staff on protecting children from the risk of radicalisation;
- Be able to understand and mitigate the unique risks associated with online safety;
- Recognise and mitigate the additional risks that children with SEN and disabilities face online, e.g. from grooming and radicalisation;
- Obtain access to resources and attend any relevant or refresher training courses;
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the Foundation may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills is refreshed (via e-bulletins, meeting other designated safeguarding leads, or by taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them time to understand and keep up with any developments relevant to their role. The Designated Safeguarding Lead should also undertake Prevent Awareness training.

## Raise Awareness

The Designated Safeguarding Lead should

- Ensure the Foundation's policies are known, understood and used appropriately;
- Ensure the Foundation's Safeguarding and Child Protection Policy is reviewed annually, as a minimum and the procedures and implementation are updated and reviewed regularly, and work with the Governing Body regarding this;
- Ensure the Safeguarding and Child Protection Policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the Foundation in this;
- Ensure the pupils are informed, in an age appropriate way about who to talk to in the event that they wish to disclose information concerning a Child Protection matter;
- Link with the Local Safeguarding Children Board to make sure staff are aware of training opportunities and the latest local policies on local safeguarding arrangements.

## Maintain and Transfer Records

The Designated Safeguarding Leads and Deputies should ensure that their part of the Foundation maintains confidential child protection records as necessary. The Foundation will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children, taking in to account the Foundation's obligations under the General Data Protection Regulation, (EU 2016/679), and the UK Data Protection Act 2018. The Foundation will cooperate with police and children's social care to ensure that all relevant information is shared for the purposes of child protection investigations under section 47 of the Children Act 1989 and in accordance with the requirements of 'Working Together to Safeguard Children, July 2018.'

If a pupil moves to another school, the Safeguarding in Education Officer at the Local Authority will be informed and any child protection information will be passed via the Safeguarding in Education Officer to a named person at the new school, ensuring secure transit and confirmation of receipt. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new School/ College in advance of a child leaving.

When a pupil reaches the end of his/her school career, any child protection information will be held securely by School for an indefinite period.

## Availability

During term time the Designated Safeguarding lead (or a deputy) in each school setting is always available (during school hours) for staff in the school to discuss any safeguarding concerns. The Designated Safeguarding lead in the Nursery and Kidzone is also available when the Nursery or Kidzone are open during the school holidays. The Designated Safeguarding lead (or deputy) is expected to be available in person but, in exceptional circumstances, availability via phone and or Skype or other such media is acceptable.

Cover arrangements for any out of hours/out of term activities are as outlined above at Section B of this policy.

The Job Descriptions for the DSLs and the DDSs can be found on the Central Services Intranet.

## **Annex 2: Key Definitions and Further Information About Issues Mentioned in this Policy:**

**A child**, as in the Children Acts 1989 and 2004 is anyone who has not reached their 18<sup>th</sup> birthday. The commitment to safeguarding and promoting the welfare of children however will extend to all children who visit Bolton School, including those who have reached the age of 18 and in some cases, past pupils of Bolton School or past users of the Nursery or Kidzone who are aged 18 years or younger.

**A child in need** is defined under section 17(10) of the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health or development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled.

**Early help** means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working together to safeguard children provides detailed guidance on the early help process.

**Extremism** goes beyond terrorism and includes people who target the vulnerable, including the young by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in society. Extremism is defined in the Counter Extremism Strategy 2015 as the vocal or active opposition to the British fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths or beliefs. Calls for the death of members of the armed forces is also regarded as extremist.

**Significant harm** is defined within The Children Act. 'Harm' means ill-treatment or the impairment of a person's physical or mental health or his/her development, whether physical, intellectual, emotional, social or behavioural. Ill-treatment includes sexual abuse and forms of ill-treatment which are not physical. In cases where the question of whether harm suffered by a child is significant turns on the child's health or development, his/her health or development shall be compared with that which could reasonably be expected of a similar child.

Section 120 of the Adoption and Children Act added the following clarification of 'impairment': 'Including for example impairment suffered from seeing or hearing the ill treatment of another.'

The interpretation of whether or not a child is suffering significant harm will depend largely on professional judgement, based on the known facts. It can include inappropriate touching, an assault, or a series of compounding events e.g. bullying. Other factors to be considered include the age and vulnerability of the child, the degree of force used, the frequency of the harm, the nature of the harm in terms of ill treatment, and the impact on the child's health and development.

More information about information can be found by following the links below or consulting the September 2018 version of KCSIE.

Re what constitutes significant harm [\\consus\bs-shared\\$\Central Services Shared Documents\CS Personnel\Policies and Procedures\CPSC - Is this significant harm Bolton Safeguarding Partners.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/684849/CPSC_-_Is_this_significant_harm_Bolton_Safeguarding_Partners.pdf)

General Schools, Colleges and Children's Services safeguarding information can be found here: <https://www.gov.uk/topic/schools-colleges-childrens-services/safeguarding-children>

Bullying including cyberbullying <https://www.gov.uk/government/publications/preventing-and-tackling-bullying>

Children Missing Education

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/395138/Children\\_missing\\_education\\_Statutory\\_guidance\\_for\\_local\\_authorities.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/395138/Children_missing_education_Statutory_guidance_for_local_authorities.pdf)

Child Missing from Home or Care

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/307867/Statutory\\_Guidance\\_-\\_Missing\\_from\\_care\\_3\\_.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/307867/Statutory_Guidance_-_Missing_from_care_3_.pdf)

<https://www.gov.uk/government/publications/children-who-run-away-or-go-missing-from-home-or-care>

Child Sexual Exploitation

<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>

<https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners>

Domestic Violence <https://www.gov.uk/domestic-violence-and-abuse>

Drugs <https://www.gov.uk/government/publications/drugs-advice-for-schools>

Fabricated or Induced Illness <https://www.gov.uk/government/publications/safeguarding-children-in-whom-illness-is-fabricated-or-induced>

Faith Abuse <https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief>

<https://www.nspcc.org.uk/preventing-abuse/safeguarding/safeguarding-faith-communities/>

Female Genital Mutilation, (FGM)

<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>

[\\consus\bs-shared\\$\Central Services Shared Documents\CS Personnel\Policies and Procedures\CPSC - 6 1639 HO SP FGM mandatory reporting Fact sheet Web.pdf](\\consus\bs-shared$\Central Services Shared Documents\CS Personnel\Policies and Procedures\CPSC - 6 1639 HO SP FGM mandatory reporting Fact sheet Web.pdf)

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/573782/FGM\\_Mandatory\\_Reporting\\_-\\_procedural\\_information\\_nov16\\_FINAL.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/573782/FGM_Mandatory_Reporting_-_procedural_information_nov16_FINAL.pdf)

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/573786/FGMPO\\_-\\_Fact\\_Sheet\\_-\\_1-12-2016\\_FINAL.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/573786/FGMPO_-_Fact_Sheet_-_1-12-2016_FINAL.pdf)

Forced Marriage <https://www.gov.uk/guidance/forced-marriage>

<https://formfinder.hmctsformfinder.justice.gov.uk/fl701-eng.pdf>

Gangs and Youth Violence

<https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence>

Gender Based Violence/Violence Against Women and Girls (VAWG)

<https://www.gov.uk/government/policies/violence-against-women-and-girls>

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/522166/VAWG\\_Strategy\\_FINAL\\_PUBLICATION\\_MASTER\\_vRB.PDF](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/522166/VAWG_Strategy_FINAL_PUBLICATION_MASTER_vRB.PDF)

Hate <http://educateagainsthate.com/>

Mental Health <https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

Missing Children and Adults Strategy <https://www.gov.uk/government/publications/missing-children-and-adults-strategy>

Private Fostering <https://www.gov.uk/government/publications/children-act-1989-private-fostering>

Preventing Radicalisation <https://www.gov.uk/government/publications/prevent-duty-guidance>  
<https://www.gov.uk/government/publications/channel-guidance>

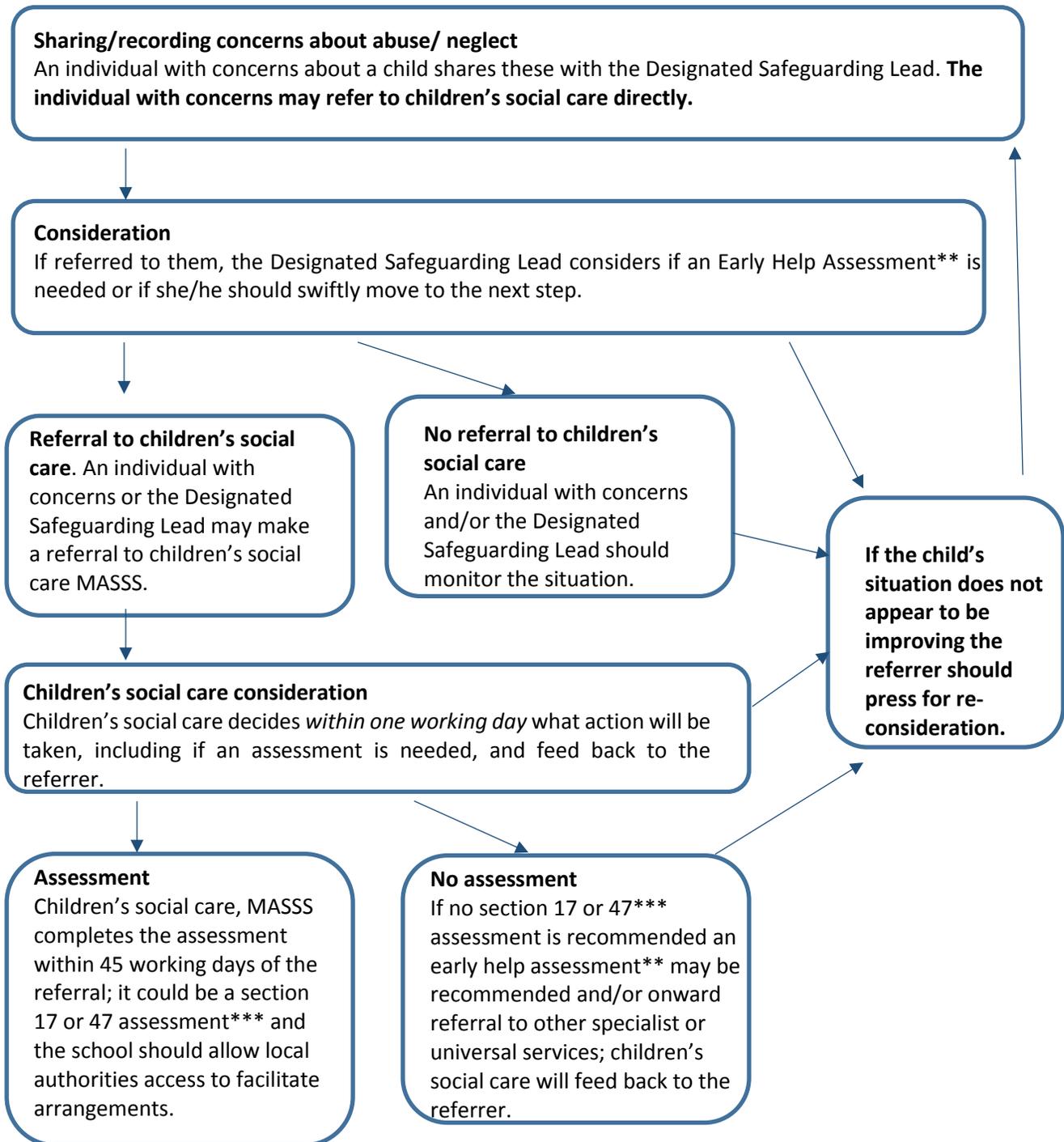
Relationship Abuse <https://www.disrespectnobody.co.uk/relationship-abuse/what-is-relationship-abuse/>

Sexting <https://www.disrespectnobody.co.uk/sexting/what-is-sexting/> and Bolton School Policies

Trafficking <https://www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance>  
<https://www.gov.uk/government/publications/care-of-unaccompanied-and-trafficked-children>

**Annex 3: Bolton Safeguarding Partner’s Flow Diagram of Action when a child has suffered or is likely to suffer harm (excluding allegations about a member of staff: see Allegations of Abuse Policy for this)**

This diagram illustrates what action should be taken and who should take it when there are concerns about a child. If, at any point, there is a risk of *immediate serious harm* to a child a referral should be made to the police and children’s social care immediately.



\*\* Where a child and family would benefit from coordinated support from more than one agency (e.g. education, health, housing, police) there should be an inter-agency assessment to prevent needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989. \*\*\* Where there are more complex needs, help may be provided under section 17 of the Children Act 1989 (children in need). Where there are child protection concerns local authority services must make enquiries and decide if any action must be taken under section 47 of the Children Act 1989.

#### **Annex 4: Bolton Early Help Procedures**

A prompt referral will be made by the Designated Safeguarding Lead to Referral and Assessment, which is part of the Bolton Multi-Agency Screening and Safeguarding Service, (MASSS), by telephone and followed up in writing, using the Early Help Assessment Form within two working days. The Early Help Assessment Form can be accessed at <http://boltonsafeguardingchildren.org.uk/working-with-children-and-young-people/early-help-and-working-together/> and once completed will be sent by email, securely, to [BoltonISA@bolton.gov.uk](mailto:BoltonISA@bolton.gov.uk) or the Integrated Working Team at the Castle Hill Centre. (For further information and relevant addresses, see Annex 5)

In some cases the issue may not be clear-cut and the DSL will be expected to use Bolton's Framework for Action procedures which provide clear thresholds for using early help processes and to request advice and guidance with colleagues from an appropriate agency- usually, but not always, Social Care. (For further information, see Annex 1 about the Role and Responsibilities of the DSL.)

#### **Annex 5: Key Contact Numbers and Websites**

The **Safeguarding in Education Officer** from the Bolton Local Authority is Jacqui Parkinson. Jacqui is the nominated person for the education sector and can be contacted on **01204 337472** or by email at [jacqueline.parkinson@bolton.gov.uk](mailto:jacqueline.parkinson@bolton.gov.uk)

The **Local Authority Designated Officer (LADO)** is **Paula Williams**. Paula can be contacted on **01204 337474** or by email at [paula.williams@bolton.gov.uk](mailto:paula.williams@bolton.gov.uk) (NB: The acronym "LADO" has been removed from KCSIE and Working Together (WT) from April 2018 in favour of "designated officer, or team of officers", to indicate that LAs now have some discretion over their approach. Bolton Local Authority and therefore Bolton School, however, continue to use the acronym "LADO" for brevity. In some situations described in this policy, it will be the Safeguarding in Education Officer, rather than the LADO, who will act.)

Other Contact Numbers include:

The Multi Agency Screening and Safeguarding Service (MASSS), based at the Castle Hill Centre, Castleton Street, Bolton BL2 2JW can be contacted on the following number: **01204 331500**

Safeguarding Teams, Farnworth Town Hall, Market Street, Farnworth, BL4 7PD

Team 1 – 01204 337432

Team 2 - 01204 337433

Team 3 – 01204 335523

Emergency Duty Social Worker 01204 337777 between 6pm and 8.45am and weekends

Integrated Working Team 01204 331394 or email at [boltonISA@bolton.gov.uk](mailto:boltonISA@bolton.gov.uk)

The Child Protection Unit, 1<sup>st</sup> Floor, Westhoughton Town Hall, Market Street, Westhoughton, Bolton BL5 1AW. Telephone 01204 337468

Police - Access to all local offices	0161 872 5050
NSPCC 24 hours 7 days	0808 800 5000
NSPCC Whistle Blowing Advice Line 8am to 8pm Monday to Friday	0800 028 0285
NSPCC <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a> or text 88858	
Childline 24 hours 7 days	0800 1111

Secure address for the return of the completed Early Help Form: [BoltonISA@bolton.gov.uk](mailto:BoltonISA@bolton.gov.uk) or by post to The Integrated Working Team, Bolton MASSS, Castle Hill Centre, Castleton Street, Bolton BL2 2JW.

For full guidelines on honour-based abuse, FGM and the law please visit the Home Office website. Anyone with concerns is asked to contact police on 101 or Crimestoppers anonymously on 0800 555111.

Bolton Safeguarding Partner's Website: [www.boltonsafeguardingchildren.org.uk/](http://www.boltonsafeguardingchildren.org.uk/)  
Greater Manchester Safeguarding Partner's Procedures Manual can be accessed at: <http://greatermanchesterscb.proceduresonline.com/index.htm>

The UK Safer Internet Centre <http://www.saferinternet.org.uk/#main-content>

CEOP's Thinkuknow website <https://www.thinkuknow.co.uk/>

Home Office Cyber Aware <http://www.cyberaware.gov.uk/>

The Forced Marriage Unit: Telephone: +44 (0) 20 7008 0151; Email: [fm@fco.gov.uk](mailto:fm@fco.gov.uk); website <https://www.gov.uk/stop-forced-marriage>

For full guidelines on honour-based abuse, FGM and the law please visit the Home Office website. Anyone with concerns is asked to contact police on 101 or Crimestoppers anonymously on 0800 555111.

**Bolton FGM Project – Drop in groups for girls and women living in Bolton**

Tel: 01204 399239

Email: [bolsomcom@hotmail.com](mailto:bolsomcom@hotmail.com)

**The NSPCC 24hour helpline to protect children and young people affected by FGM**

Tel: 0800 028 3550

**Third Sector Agencies Working With FGM**

**Foundation for Women's Research and Development (FORWARD)**

Tel: 0208 960 4000

Email: [forward@forwarduk.org.uk](mailto:forward@forwarduk.org.uk)

**AFRUCA – Africans Unite Against Child Abuse**

Tel: 0161 953 4711/4712

[www.afruca.org](http://www.afruca.org)

[info@afruca.org](mailto:info@afruca.org)

**Saheli Asian Women's Refuge**

Tel: 0161 945 4187

Email: [saheliltd@btconnect.com](mailto:saheliltd@btconnect.com)

[www.saheli.org.uk](http://www.saheli.org.uk)

**For Patterdale Hall**

To report child protection concerns call the Hub on 0333 240 1727

<https://www.cumbria.gov.uk/secure/LSCBContact/>

NB - In the unlikely event that the hub number is unavailable due to a fault please call 01768 895019; this is the number for the Duty Social Worker. This should only be used in exceptional circumstances and should not be used during office hours (8am to 5pm Monday to Thursday and 8am to 4.30pm Friday).

If you have concerns regarding an adult who works with a child then this should be reported to the Local Authority Designated Officer (LADO) within one working day. To report a concern to LADO please use the notification form:

<http://www.cumbrialscb.com/elibrary/Content/Internet/537/6683/6687/6755/4168713469.docx>

<http://www.cumbrialscb.com/professionals/lado.asp>

To speak to a LADO for advice please contact Multi-Agency Business Support Team who will take your details and ensure a LADO returns your call: Phone 01768 812267. LADO working hours are Monday to Thursday 9am to 5pm and Friday 9am to 4.30pm. Or you can email [lado@cumbria.gov.uk](mailto:lado@cumbria.gov.uk). In case of emergency outside of the above hours please contact Emergency Duty Team on 0333 240 172.

## **Appendix 1: Foundation Policy on The Prevent Strategy**

*(This section is underpinned by the Statutory guidance issued under section 29 of the Counter-Terrorism and Security Act 2015.)*

The national Prevent Strategy aims to stop people becoming terrorists or supporting terrorism. The Bolton School Foundation, working with other local partners, families and communities, seeks to play a key role in ensuring that the children and young people who attend the schools/ settings or use its services are safe from the threat of terrorism. Prevent is part of the Foundation's wider responsibility for Safeguarding and this policy is therefore linked to the Foundation Policy for Safeguarding and Child Protection.

The Prevent strategy identifies that young people are more likely to be vulnerable to violent extremist or terrorist narratives, including non-violent extremism which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. The Government's Prevent Strategy defines extremism as 'Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs'.

We believe that Bolton School should be a safe place where children and young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of the terrorist ideology, and learn how to challenge such ideas.

In order to fulfil our Prevent Duty, we undertake to do the following:

- Actively promote Fundamental British Values, including mutual respect, tolerance and democratic participation, as part of our wider SMSC/ PSHEE programmes as well as within other subject areas and assemblies;
- Encourage children and young people to develop strategies to manage risk, resist pressure and make safe choices;
- Respect learner and staff diversity, encouraging freedom and openness;
- Effectively engage with parents/carers;
- Assist and advise families who raise concerns and point them in the direction of the correct support mechanisms;
- Assess the risk of children in our schools/ settings/ activities being drawn in to terrorism;
- Maintain robust safeguarding policies which take in to account the policies and procedures set out by Bolton Safeguarding Partners and identify extremism/ radicalisation as issues to be reported promptly to the Staff lead;
- Identify a nominated Staff Lead to communicate and promote the importance of the Prevent duty (Mrs Lynne Kyle and Mrs Catherine Winder in the Girls' Division Senior School; Mrs Carol Laverick and Mrs Helen Holt in Hesketh House; Mrs Tracey Taylor in Beech House; Miss Jo Hewitt in the Nursery; Mrs Laura Smith in Kidzone and BSSL Leisure Services; Mrs Helen Brandon in the Boys' Division Senior School; Mrs Sue Faulkner in the Boys' Junior School; Mrs Cathy Fox in Central Services and Mr Tim Taylor at Patterdale Hall);
- Train staff so that they have the knowledge and confidence to identify children at risk of being drawn into terrorism, and to challenge extremist ideas which can be used to legitimise terrorism;
- Conduct due diligence checks on groups/ individuals seeking to hire or use school premises;
- Conduct due diligence checks on visitors to school, particularly visiting speakers, whether invited by children or staff;
- Conduct due diligence checks on contractors working on the school sites;
- Ensure children are safe from terrorist and extremist material when accessing the internet in School;
- Review our policies at least annually.

## Possible Indicators of Risk

- Racist graffiti/ symbols/ comments made in School;
- Speaking out or writing in favour of extremist ideas in school work;
- Extreme comments shared on social media;
- Distribution of extreme or terrorist propaganda among other pupils;
- Vulnerable students being influenced by others (although we are aware of a need to avoid over-simplified assessments of who might be 'vulnerable'), because of the existence of one or more factors, which may include:
  - o An identity crisis, involving an individual's distance from their cultural/ religious heritage, including peer/ family/ faith group rejection;
  - o A personal crisis, including family tension/ social isolation/ friendship issues;
  - o Personal circumstances, such as migration, experience of racism;
  - o Unmet aspirations;
  - o Criminality;
  - o Experience of poverty, disadvantage, discrimination or social exclusion;
- Association with those known to be involved in extremism (including via the internet);
- A significant shift in the child/ young person's behaviour or outward appearance, particularly involving conflict with his/her family and/or faith group;
- Travel for extended periods of time to international locations known to be associated with extremism;
- Disguising of a child's identity, e.g. in documentation;
- A simplistic or flawed understanding of religious/ political/ global issues;
- A significant adult or other in the child/ young person's life who has extremist views or sympathies;
- Critical risk factors, being:
  - o Contact with extremist recruiters;
  - o Articulation of support for extremist causes/ leaders;
  - o The possession of extremist literature;
  - o Using extremist narratives and a global ideology to explain personal disadvantage;
  - o Justifying the use of violence to solve societal issues;
  - o Membership of extremist organisations.

## Supportive Interventions

- Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for the Foundation to make referrals if there are concerns that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.
- Should concerns require support from other agencies, the following are ways in which terrorism and extremism can be reported:
  - o Anti-terrorist hotline: 0800 789 321
  - o Crime stoppers: 0800 555 111
  - o Relevant police force: 101
  - o [www.gov.uk/report-suspicious-activity-to-mi5](http://www.gov.uk/report-suspicious-activity-to-mi5)
- To report any online terrorist-related material: [www.gov.uk/report-terrorism](http://www.gov.uk/report-terrorism)
- For non-emergency advice for staff and Governors the DfE have a dedicated telephone helpline and mail box: 02073407264 and [counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk)
- Other links to information include:  
<https://www.gov.uk/government/publications/channel-guidance> and  
<http://educateagainsthate.com/> and  
[http://course.nalt.com/Channel\\_General\\_Awareness/01/index.html](http://course.nalt.com/Channel_General_Awareness/01/index.html) and  
<https://www.gov.uk/government/publications/prevent-duty-guidance>

## **Appendix 2: Bolton School E-Safety Policy**

Bolton School provides internet access for pupils and staff to raise educational standards, to promote pupil achievement, to support the professional work of staff and to enhance the school's management information and business administration systems.

The use of technology has, however, become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation - technology often provides the platform that facilitates harm. The Foundation has therefore developed an effective approach to online safety which empowers each school/ setting to protect and educate the whole school community in their use of technology and establishes mechanisms to identify, intervene and escalate any incident where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

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

The School recognises Policies and procedures are in place to maintain online safety for both children and adults. These policies and practices are part of the school's wider safeguarding strategy.

All Junior and Senior School pupils are required to sign and observe the following Acceptable Use Policies:

- ICT AUP (signed when pupils join the School by both pupils and parents and updated by pupils as appropriate);
- iPad AUP (signed when pupils are first given their iPad by both pupils and parents and updated as appropriate);
- Social Networking Policy for Pupils.

All members of teaching staff and those support staff who have access to the Network at School are required to sign and/or observe the following Acceptable Use Policies:

- ICT AUP (signed when all members of staff are given access to the Network and updated as appropriate);
- iPad AUP (signed if and when members of staff are first given their iPad and updated as appropriate).
- Acceptable Use of ICT Equipment and Systems Policy
- Acceptable Use Policy for Telephones, Smart Phones, Mobile Phones and Devices and Internet Telephony
- Acceptable Use of Internet and Social Networking Policy
- Acceptable Use Policy for iPads & Laptops
- Acceptable Use of Email Policy
- Data Security Policy

In addition, members of staff, volunteers and other adults are required to observe the Behaviour Policy for Staff, Volunteers, Contractors and Other Adults which includes information about appropriate on-line behaviour as well as the use of photographic, video and audio digital or analogue technology. Staff are made aware that a breach of this or other policies may result in disciplinary action. There is additional information for staff working in the Early Years Settings regarding the taking and storage of images.

### **Roles and Responsibilities for Online Safety**

The Foundation Head of ICT Services has the responsibility of ensuring that the technical provision and ICT infrastructure across the Foundation have appropriate safeguards in place to filter and monitor appropriate content and to alert the school to any potential safeguarding issues.

In each school and setting, the Headteacher (or a member of his/her SLT) or the Manager (or her Deputy) has responsibility for:

- ensuring that all teaching and relevant support staff sign and uphold the relevant Acceptable Use Policies. The Clerk and Treasurer has the same responsibility for Central Services and BSSL Staff;
- ensuring that all pupils and parents sign and uphold the relevant Acceptable Use Policies.

If pupils/ children discover unsuitable sites, they are instructed to alert a member of the staff. Staff are then instructed to alert a member of SLT/ Management and/or the ICT staff.

The DSL, supported by the DDSL, has responsibility for ensuring that on-line safety is promoted by policies and procedures within school and that children, staff, and parents are made aware of how to safeguard themselves and others on line.

### **The School's Technical Provision & Infrastructure**

The school's internet access includes appropriate filtering systems. The school has systems for internet security, anti-virus protection, email filtering and web filtering, which monitor each and every web page, and email for offensive and unacceptable content, including extremist information or information about terrorism. The school reserves the right to use this system to monitor all information passed via the school network. Any material that the school believes is illegal will be referred on.

School iPads are filtered and managed by a mobile device management solution. Student iPads are configured with MDM profiles that must not be removed. These iPad profiles lock the iPad to the school filtering system, preventing inappropriate content and enabling the School to manage the devices.

In particular, there is no access to Social Networking sites through the school iPads in the Girls' Division and in the Boys' Division Junior School. An e-mail is sent to the Lightspeed administrators and Head of ICT Services and to a member of the Divisional SLT if a profile is removed. The student's iPad will be investigated and may be subject to a sanction if s/he has deliberately removed a profile.

Emerging technologies will be examined for educational benefit and a risk assessment will be carried out before use in school is allowed.

### **Education of the Pupils/Parents/Staff About E-Safety**

Pupils are taught in ICT and/or PSHEE lessons or sessions what internet use is acceptable and what is not as appropriate to their age and setting. In particular, they are informed that they must not reveal personal details (including their address or telephone number) or others' details in e-mail communication or via a personal web space; neither must they arrange to meet anyone. Pupils are encouraged to report all issues and concerns to a member of the pastoral team, who will escalate the matter to a member of the SLT and who, in turn, will pass the matter on to the Foundation Head of ICT Services.

Issues around Cyberbullying are discussed in PSHEE lessons and are included in the different schools'/ settings' Anti-bullying and Behaviour Management policies. Any form of bullying or harassment is strictly forbidden and sanctions are used as appropriate for those who engage in cyber/text bullying. When publishing material to websites and elsewhere, pupils are taught to consider the thoughts and feelings of those who might view the material. Action is also taken against any person who brings the school into disrepute through publication of inappropriate electronic materials/communications.

Pupils are taught that they may only use approved e-mail accounts on the school system and may only communicate to staff via school accounts. Pupils are required to inform a teacher if they receive an

offensive e-mail. The teacher will then escalate the matter to a member of SLT and, through him or her, to the Head of ICT Services.

Staff safeguarding training includes information about online safety.

Parents are given information about online safety at the annual Parents' Information Evenings, via documentation received about the iPads, and in other Divisional publications.

### **The Management of Personal Data**

The Foundation has appointed the Clerk & Treasurer, Mrs C L Fox, to be responsible for regulatory compliance concerning how the Foundation uses personal data and ensures that personal data is processed in compliance with the Foundation's Privacy Notice and Data Protection Law.