



RUGBY
SCHOOL
GROUP

Safeguarding and Child Protection Policy

September 2021

This policy is open for consultation until 1 October 2021.

Any comments/feedback re Rugby School should be directed to the Deputy Head, Pastoral via deputyhead@rugbyschool.net

Any comments/feedback re Bilton Grange should be directed to the Assistant Head, Pastoral via mje@biltongrange.co.uk

Rugby School and Bilton Grange, including Boarding provision and the EYFS setting, (The School) fully recognises its responsibilities for Child Protection and Safeguarding, and this Policy sets out how we will deliver these responsibilities. The policy should be read with reference to:

References: **‘Working Together to Safeguard Children’** A guide to inter-agency working to safeguard and promote the welfare of children – February 2019 (HM Gov)

‘Keeping Children Safe in Education’ Statutory guidance for schools and colleges – September 2021 (DfE) All references to KCSiE in this policy refer to the September 2021 version

What to do if you’re worried a child is being abused: Advice for practitioners – March 2015 (HM Gov)

‘Information Sharing’ Advice for Practitioners providing safeguarding services to children, young people, parents and carers – July 2018

Warwickshire Safeguarding Children

on making referrals: Advice for governing bodies, proprietors, headteachers, principals, senior leadership teams and designated safeguarding leads

Statutory framework for the early years foundation stage – Setting the standards for learning, development and care for children from birth to five – April 2017

Child Sexual Exploitation – Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation – February 2017 (DfE)

Sexual violence and harassment between children in schools and colleges – Advice for governing bodies, proprietors, headteachers, principals, senior leadership teams and designated safeguarding leads – September 2021

Revised Prevent Duty Guidance (1 April 2021)

The Prevent Duty, Departmental advice for schools and childcare providers (June 2015 (DfE)

Children missing in education – Statutory guidance for local authorities (September 2016)

Promoting the education of looked after children and previously looked after children (February 2018)

The designated teacher for looked after and previously looked after children (February 2018)

Multi-agency statutory guidance on FGM (July 2020)

Preventing youth violence and gang involvement (Aug 2013)

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

Criminal exploitation of children and vulnerable adults: county lines (Sept 2018)

<https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>

Teaching Online Safety in Schools (June 2019)

<https://www.gov.uk/government/publications/teaching-online-safety-in-schools>

Sharing nudes and semi-nudes: advice for education settings working with children and young people
(December 2020)

<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

Mental health and behaviour in schools (November 2018)

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

Searching, screening and confiscation (January 2018)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/674416/Searching_screening_and_confiscation.pdf

CONTACT NUMBERS AND DETAILS

Key personnel

The Designated Safeguarding Lead (DSL):

Rugby School: Mrs Sally Rosser, Deputy Head, Pastoral
email: sar@rugbyschool.net tel: 01788 556350 / 07917 550976

Bilton Grange: Mrs Mireille Everton, Assistant Head, Pastoral
email: mje@biltongrange.co.uk tel: 01788 810780 / 07423663038

The Deputy Designated Safeguarding leads:

Rugby School: Miss Lisa Greatwood,
Assistant to Deputy Head Pastoral, Assistant Chaplain and Head of RSHE Programme
email: lfg@rugbyschool.net tel: 01788 535607 / 07458 133105

Mr Peter Bell, Assistant Head, Houses
email: pkb@rugbyschool.net tel: 01788 556172 Mobile: 07967 012838

Bilton Grange: Mr Mark Tovey, Assistant Head Boarding
email: mgt@biltongrange.co.uk tel: 01788 810773 / 810764

Mrs Katie Gedye, Assistant Head Pre-Prep (for EYFS)
email: kg@biltongrange.co.uk tel: 01788 810719

Mr Stefan de Bruin, Head of Upper School
email: sdb@biltongrange.co.uk tel: 01788 810217

Mr Chris Bartley, Head of Lower School
email: cbb@biltongrange.co.uk tel: 01788 810217

Senior School Counsellor and Emotional Wellbeing Lead:

- Mrs Mikala Torrance, School Counsellor
email: mt@rugbyschool.net tel: 01788 556199 / 07584 481068

Sports Centre

- Ms Aimi Knight-Allen, Sports Centre Manager
email: ack@rugbyschool.net tel: 01788 556339

Music Dept

- Mr James Williams, Head of Academic Music
email: jaw@rugbyschool.net tel: 01788 556207

Designated teacher for Looked After Children

Rugby School: Mrs Sally Rosser, Deputy Head, Pastoral
email: sar@rugbyschool.net tel: 01788 556350 / 07917 550976

Bilton Grange: Mrs Mireille Everton, Assistant Head, Pastoral
email: mje@biltongrange.co.uk tel: 01788 810780 / 07423663038

The nominated Child Protection governor:

Rugby School: Ms Charlotte Marten
email: cm1@rugbyschool.net tel: 07976 203164

Bilton Grange: Mr John Moreland
Email: jm2@rugbyschool.net tel: 07545 496585

The Chair of Governors:

- Mr B O'Brien
email: bob@rugbyschool.net tel: 0207 359 2354 / 07802 630608

The Head:

Rugby School: Mr Gareth Parker-Jones
email: head@rugbyschool.net tel: 01788 556217

Bilton Grange: Mr Gareth Jones
email: gebj@biltongrange.co.uk tel: 01788 810217

Pre-Prep: Mrs Katie Gedye

email:

tel: 01788 810719 / 07974 303708

The Executive Head Master:

- Mr Peter Green

email: headmaster@rugbyschool.net

tel: 01788 556201

Warwickshire Multi-Agency Safeguarding Hub (MASH) now known as the Integrated Front Door

Advice line Monday to Friday 0900-1700

01926 414144

Out of hours number

886922

Electronic Form

triagehub@warwickshire.gov.uk

Integrated Front Door Education Lead

01926 418608

Disclosure and Barring Service

PO Box 181, Darlington DL1 9FA

01300 0200190

Local Authority Designated Officer

For allegations against members of staff/volunteers

01926 745376

Independent Person (Rugby School and Bilton Grange)

Faith Matthews

07867 558511

Police

Non emergencies

101

Emergencies

999

Childline

08001111

Office of the Children's Commissioner

020 7783 8330

info.request@childrenscommissioner.gsi.gov.uk

NSPCC Whistleblowing Helpline

0800 0280285

Help@nspcc.org.uk

OTHER USEFUL SOURCES OF INFORMATION

NSPCC offers information for schools on their website: <http://www.nspcc.org.uk/>

Broad government guidance on specific safeguarding issues can be found via the GOV.UK website

The current version of this policy can be found on the School's website. In order that any deficiencies or weaknesses in the policy or practice are remedied without delay and that Rugby School and Bilton Grange are consistently following best practice, this policy is subject to change at short notice. The 'Date of Last Review' on the first page, will indicate the date of the latest amendments to the policy. "The School" refers to both Rugby School and Bilton Grange.

1 INTRODUCTION

- 1.1 The School firmly believes that all children have a right to achieve their potential and to be protected from all forms of harm, including abuse and neglect, and that school staff have a particularly important role in the wider safeguarding system for children, as they are in a position to identify concerns early and take action to secure help for children who need it.
- 1.2 The School takes a child centred approach to safeguarding and emphasises through training, the need to listen to children and to pay attention to changes in behaviour, presentation and demeanour, as these may be indicators of abuse.
- 1.3 The Governing Body, the Head and the staff of the School are committed to the physical, emotional and spiritual well-being of all the children in their care. Both children and adults need a safe open and secure environment in which to live and work. The policy applies to all staff, governors and adult volunteers and to contact both inside and outside normal school hours. All students, including those who are eighteen years old and are considered to be vulnerable adults are to be regarded as children in the implementation of this policy.
- 1.4 The School is committed to implementing good practice, as reflected in the references listed at the start of this policy. The School recognises that safeguarding is everyone's responsibility and that anyone can make a referral to social care. The School follows the procedures of the Warwickshire Safeguarding Children Partnership Guidance on making a referral which can be found at:
<https://www.safeguardingwarwickshire.co.uk/safeguarding-children>
- 1.5 The use of mobile phones and cameras within the Early Years setting are restricted, see the EYFS Policy for further details.
- 1.6 The safeguarding team is listed at the start of this policy.

The DSL and Dep DSLs have undergone appropriate training and renew this every two years.

The DSL and Deputy DSLs are responsible for maintaining clear communications with Children's Social Care (contact details are given at the end of this document) and other external safeguarding agencies, Ofsted (for EYFS) and DfE on all matters relating to Child Protection.

The School aims to work in partnership and recognises its important role in multi-agency safeguarding arrangements as set out by Working Together to Safeguarding Children – July 2018. The DSL or Deputy DSLs (if the DSL is unavailable) will make Early Help Assessments and referrals to Local Safeguarding Partners (LSCBs, Social Services, or the Police as appropriate), or seek safeguarding advice on marginal cases from the Warwickshire Safeguarding Children Partnership'. Guidance may also be sought from the Integrated Front Door Lead (previously known as the Education Lead) via 01926 418608 Referrals to the LADO will be made by the DSL or Head/Head of Bilton Grange. Further details of the roles and responsibilities of the DSL and Deputy DSLs are recorded in their job descriptions which can be accessed upon request. Contact details for the DSL and Deputy DSLs are on page 2. Ultimate lead responsibility for safeguarding and child protection remains with the DSLs. Rugby School: the Deputy Head Pastoral and Bilton Grange: the Assistant Head Pastoral who are members of the School's Senior Leadership Team.

- 1.7 The School has trained Counsellors who support students and staff. The Counsellors will not promise confidentiality where child protection is concerned and will inform the DSL/Dep DSL of any child protection issues they become aware of. Where families are in need of additional support from one or

more agencies, the School will work with the LSCB to signpost additional services, which may involve the coordination of services under the Early Help Assessment and Team Around the Child (TAC) approaches. A decision to refer a child would normally be taken in consultation with the child and parents, although consent is not required for making a referral when there are reasonable grounds to believe a child is at risk of significant harm.

- 1.8 The School has Governors with specific responsibility for overseeing safeguarding and child protection matters, who regularly meet with the DSLs.
- 1.9 The School's Local Safeguarding Children's Board is the Warwickshire Safeguarding Children Partnership, however the School's extensive catchment area means that it is necessary to work with other LSCBs. Contact details can be found on page 2.
- 1.10 The School has an Independent Person, who is available to listen to students wishing to confide in someone outside of school. If a safeguarding concern is raised, the Independent Person will report straight away to the DSL or a Deputy DSL if the DSL is unavailable. There is a maximum five year term for the role of Independent Person, and the Independent Person is subject to Safer Recruiting checks, Safeguarding and Child Protection Training and reading 'Keeping Children Safe in Education; Information for all School and College Staff' – September 2021 including Part 1 and 'What to do if you're worried a child is being abused; Advice for practitioners – March 2015'.
- 1.11 The School recognises the potential risk of peer on peer abuse and that the opportunities for this kind of abuse are greater within a boarding environment. The School takes measures to minimise this risk including the implementation of the Anti-Bullying Policy; training of peer mentors; raising awareness through staff and prefect training; RSHE lessons and assemblies that reinforce the messages that sexting and banter are unacceptable. The School recognises that abuse is abuse and should never be tolerated or passed off as 'banter' or 'just having a laugh' or 'part of growing up'. Such abuse will be dealt with as a safeguarding concern with both victim and perpetrator receiving appropriate support. The School also recognises that there is a greater risk to girls and students with SEN/D of peer on peer abuse, but that all peer on peer abuse is unacceptable and must be taken seriously. It also recognises that there are different forms of peer on peer abuse such as sexual violence and sexual harassment; physical abuse; sharing nudes and semi-nudes; initiation/hazing type violence and rituals. Staff are trained to recognise and refer incidents of peer on peer abuse to the DSL. The School maintains full compliance with the National Minimum Standards for Boarding.
- 1.12 The School accepts responsibility for establishing procedures for responding to allegations of abuse and for providing guidelines for good practice, which will be reviewed regularly in consultation with Warwickshire Education Safeguarding, to ensure that procedures comply with locally agreed interagency procedures.
- 1.13 The School ensures that all staff and volunteers in regulated activity are checked using procedures recommended by the Independent Schools Council and provided by the Disclosure and Barring Service, Safer Recruitment procedures, including EEA checks where applicable. Further details can be found in the Safer Recruitment Policy.
- 1.14 The School undertakes to monitor the use of the procedures and guidelines, to contribute to interagency procedures and to ensure these are in line with locally agreed interagency procedures (for Warwickshire Education Safeguarding. The Governing Body conducts an annual review of the School's Child Protection policies & procedures and the efficiency with which the duties have been discharged, as informed by the Student Pastoral Welfare Committee.

- 1.15 The School recognises the need for appropriate training and access to advice on child protection and safeguarding concerns (including understanding of the local Early Help process and their own role within it) for all staff, including the School's medical and ancillary staff as well as volunteers. DSL/Dep DSLs attend LSCB training in Child Protection and Inter Agency Working at least every two years. The DSL and Dep DSLs are trained to Level 4. All other staff (including the Heads and Governors) and volunteers undertake Safeguarding and Child Protection training and are kept current through regular refresher training and briefing sessions, which occur at least annually and are delivered by the DSLs. Staff are regularly reminded to maintain an attitude of **'it could happen anywhere, including here'** with regards to safeguarding and child protection. Staff are trained to refer reports of peer on peer abuse including child on child sexual violence or sexual harassment to the DSL in order that appropriate actions can be taken to safeguard those involved in accordance with DfE Guidance – Sexual violence and sexual harassment between children in schools and colleges – May 2018. A record of safeguarding training is kept on the Single Central Register. Staff also receive annual e-safety updates and refresher training. Induction of new staff includes training in child protection and safeguarding; online safety; the role and identity of the DSL and Deputy DSLs; the safeguarding response to children who go missing from education; the rewards and sanctions policy (student behaviour policy) and the staff code of conduct. The DSLs have been trained to deliver In-Service Safeguarding Training.
- 1.16 The School believes that this policy statement is necessary in the interests of the protection of both students and staff, and that it must be reviewed by the Board of Governors annually. Amendments to the policy will be made as necessary in the interim period to ensure that it remains current. These amendments are reviewed by the Student Pastoral Welfare Committee. The Chair of Governors will sign to approve the policy once it has been reviewed by the Board of Governors.
- 1.17 All school staff are aware that when students are engaged in school supported activities outside of the immediate school campus, there is a need to ensure that all possible precautions are taken to safeguard their welfare. This may include activity days, adventure training periods, visits to other education establishments where an external provider delivers teaching and learning to our students. This is particularly important where overnight accommodation is included within the activity. In such cases the School may request evidence of the external provider's Safeguarding and Child Protection Policy including the checking of their staff using the Disclosure and Barring Service. In the event that the School is unhappy with any aspect of such external provision, the School would look to use an alternative external provider.
- 1.18 Contextual safeguarding; the School recognises that Safeguarding incidents and/or behaviours can be associated with factors both outside children's home environments and outside school and/or can occur between children outside the school. The DSL, deputy DSLs and all staff will consider the context within which such incidents and/or behaviours occur. Contextual safeguarding means that assessments of children should consider wider environmental factors present in a child's life that are a threat to their safety and/or welfare. Staff will listen to children and be vigilant about any signs or indicators that would suggest children may be at risk in the community and will share intelligence with the Police in order to prevent children suffering harm. The School will provide as much information as possible when asked to do so as part of a police investigation and/or when making referrals to Children's Social Care, thus allowing any investigation or assessment to consider all the available evidence and the full context of any abuse.
- 1.19 Staff have been issued with a Safeguarding Aide Memoire which is designed to be carried in their ID card holder and has contact details of staff to whom concerns must be reported.
- 1.20 This policy is available on the school website and should be cross-referenced with the following policies.
- Acceptable Use of Technology – Staff
 - Acceptable Use of Technology - Students
 - Admissions Policy

- Student Mental Health and Well-being
- Anti-Bullying
- Behaviour Management (Bilton Grange including EYFS)
- Discipline and Rewards (Rugby)
- Confidentiality
- Smoking, Alcohol and Drugs
- E-Safety
- First Aid
- Health & Safety
- Medical Care
- Mobile Phones & Personal Devices
- Photographs & Images of Children
- Registration and Attendance Policy
- Searching a Student
- Searching for a Missing Student
- Staff Code of Conduct
- Staff Safer Recruitment
- Supervision of Visitors to Boarding Houses
- Tackling Extremism and Radicalisation
- Visiting Speakers
- Whistle Blowing

1.21 IT Services operate a robust filtering and monitoring system to safeguard students and staff. Inappropriate usage reports are generated when there is cause for concern. Teachers in certain subjects (eg: ICT) are able to remotely monitor the screen and keyboard activity of their students. See E-Safety Policy.

2. DEFINITIONS & CAUSES FOR CONCERN

It is the responsibility of all staff to be aware of the signs of abuse and neglect so that they can identify children in need of help or protection, and report any such concerns to the DSL or Dep DSL straight away.

- 2.1 An abused child is one who has suffered from, or is believed to be potentially at risk of suffering from, physical injury, neglect, emotional abuse or sexual abuse.
- 2.2 Safeguarding and promoting the welfare of children is defined as: protecting children from maltreatment; preventing impairment of children's physical and mental 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. A child is deemed to be anyone under the age of 18.
- 2.3 A vulnerable adult is defined as a person aged 18 or over, who has either a dependency upon others in the performance of, or a requirement for, assistance in the performance of basic functions; a severe impairment in the ability to communicate with others; or has a reduced ability to protect themselves from assault, abuse or neglect. This can be as a result of a learning or physical disability; a physical or mental illness chronic or otherwise; or a reduction in physical or mental capacity.
- 2.4 Abuse and Neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting; by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults or another child or children.

- 2.5 Children with special educational needs and disabilities can face additional safeguarding challenges, which can make recognition of indicators of abuse or neglect harder to recognise (see para 185 of Keeping Children Safe in Education for further details). They can also be more vulnerable to peer on peer abuse.

Types of Abuse and Neglect

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by adult men or women or by other children or young people. Staff are trained to understand and recognise indicators of all four categories of abuse as defined below.

- a) **Physical Abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, ill health in a child (this used to be called Munchausen's Syndrome by Proxy, but is now more usually referred to as fabricated or induced illness).
- b) **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food and clothing, shelter (including exclusion from home or abandonment); failing to protect a child from physical and emotional harm or danger; failing to ensure adequate supervision including the use of inadequate caregivers; or the failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
- c) **Emotional Abuse:** the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- d) **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 sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (see section 2.11).

Definitions taken from Keeping Children Safe in Education (DfE 2021)

Child sexual exploitation (CSE) is a form of 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 occur through the use of technology.

It should also be remembered that children can also abuse. The children who abuse will need help too. They may themselves have been abused.

2.6 All Staff have a responsibility to provide a safe learning environment, to identify children in need of extra help who are suffering or are likely to suffer from significant harm. All Staff are required to report any child protection or safeguarding concerns directly to the DSL/Dep DSLs without delay, so that the welfare of the child is paramount at all times. This can be done using My Concern, or in person, or by email or by telephone.

2.7 Possible Signs of Abuse

a) Physical Abuse

Children will collect cuts, bruises and injuries, and these should be interpreted in the context of the child's medical/social history, development stage and the explanation given. Most accidental bruises are seen over bony parts of the body, e.g. elbows, knees, shins, and are often on the front of the body. Some children, however, will have bruising that is more than likely inflicted rather than accidental.

Important indicators of physical abuse are bruises or injuries that are either unexplained or inconsistent with the explanation given; these can often be visible on the 'soft' parts of the body where accidental injuries are unlikely, e.g. cheeks, abdomen, back and buttocks. A delay in seeking medical treatment when it is obviously necessary is also a cause for concern.

The physical signs may include:

- Unexplained bruising, marks or injuries on any part of the body.
- Multiple bruises – in clusters, often on the upper arm, outside of the thigh
- Cigarette burns
- Human bite marks
- Broken bones
- Scalds, with upward splash marks
- Multiple burns with a clearly demarcated edge

Behaviours that can also indicate physical abuse:

- Fear of parents being approached for an explanation
- Aggressive behaviour or severe temper outbursts
- Reluctance to get changed, for example in hot weather
- Depression
- Withdrawn behaviour
- Running away from home

b) Emotional Abuse

Emotional abuse can be difficult to identify as there are often no outward physical signs. Indications may be a developmental delay due to a failure to thrive and grow, however, children who appear well cared for may nevertheless be emotionally abused by being taunted, put down or belittled. They may receive little or no love, affection or attention from their parents or carers. Emotional abuse can also take the form of persistent overly high expectations being placed on a child or preventing a child from being allowed to mix and play with other children.

- Continual self-deprecation
- Fear of new situations
- Inappropriate emotional responses to painful situations
- Self-harm or mutilation
- Neurotic behaviour - obsessive rocking, thumb-sucking and so on
- Air of detachment - "don't care attitude"
- Social isolation - does not join in and has few friends
- Desperate attention-seeking behaviour
- Eating problems, including over-eating and lack of appetite
- Depression, withdrawal
- Severely delayed social development, poor language and speech

c) Sexual Abuse

It is important to remember that sexual abuse is committed by adult males, adult females, young people and children of both sexes. Where sexual abuse of children by children is suspected both victims and perpetrators must be regarded as being in need of safeguarding. There may be physical or behavioural indications of sexual abuse.

The physical signs of sexual abuse may include:

- Pain, irritation, bruising or bleeding in or near the anal or genital areas
- Discomfort when walking or sitting down
- Pregnancy
- Injuries to the body
- Sexually transmitted diseases

Behaviours that can also indicate sexual abuse:

- Sudden changes in behaviour
- Fear of being left with certain people or groups of people
- Sexual knowledge beyond their age/developmental level
- Attempts to teach other children about sexual activity
- Being sexually abusive to other children
- Self-destructive behaviours, such as self-harm, eating disorder or substance abuse.
- Unexplained gifts or money
- Sexually provocative behaviour
- Bedwetting
- Not being allowed to have or withdrawing from, friends (particularly in adolescence) ☐ Saying they have secrets that they cannot tell anyone

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

Possible additional indicators of Child Sexual Exploitation are:

- Unexplained gifts or new possessions
- Associating with other young people involved in CSE
- Children/young people having older boyfriends or girlfriends
- Changes in emotional well-being
- Children/young people who misuse drugs and/or alcohol
- Children/young people who go missing for periods of time or regularly come home late
- Regularly missing school

Like all forms of sexual abuse, Child Sexual Exploitation affects boys as well as girls, and can affect any child or young person under the age of 18 years, including 16 and 17 years olds who can legally consent to have sex. The School will adhere to the DfE guidance 'Sexual violence and sexual harassment between children in schools and colleges – May 2018

d) Neglect

It can be difficult to recognise neglect which can take place in many forms, however, its effects can be long term and damaging for children.

The physical signs of neglect may include

- Constant hunger
- Poor personal hygiene
- Inappropriate or dirty clothing
- Losing weight or constantly being underweight

Neglect may also be indicated by:

- A child being left alone or unsupervised at an inappropriate age
- Being tired frequently
- Untreated medical problems
- Frequent lateness or non-attendance at school
- Low self-esteem
- Poor social relationships

It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused. It is very important that staff report all of their concerns, however minor or insignificant they may think they are – they do not need 'absolute proof' that the child is at risk. Any child in any family in any school could become a victim of abuse. Staff should always maintain an attitude of "It could

happen here". All staff have been trained and have access to My Concern which is the School's system of reporting a concern.

- 2.8 **Absences** - Frequent or unexplained patterns of absence from school are a cause for concern and may indicate that a child or young person has safeguarding needs. Unusual absence profiles should be referred to the DSL/Dep DSLs. The School recognises the importance of monitoring school attendance and of keeping the relevant local authorities informed of students joining and leaving the school in accordance with requirements outlined in the DfE publication Children missing education – Statutory guidance for local authorities – September 2016. For further information please see the Admissions Policy and the Registration and Attendance Policy.
- 2.9 **So-called 'Honour Based' Violence: Female Genital Mutilation (FGM), Forced Marriage and Breast Ironing** - If there is a perceived risk that a child or young person may be affected by FGM this concern must be reported immediately to the DSL, Head and the Police. The concern should not be discussed with family/carers prior to making the referral. There is a legal duty on teachers to inform the police [by calling 101] immediately if they discover, or suspect, that an act of FGM appears to have been carried out on a girl under the age of 18. This can be done directly without reference to other staff but there should usually be consultation with the DSL, a School Nurse or a member of the school medical team. See Part One of Keeping Children Safe in Education for further details. Forced marriage and breast ironing are not subject to a mandatory police referral requirement but must be considered as safeguarding concerns.
- 2.10 **Private Fostering** – The School recognises its duty to inform the Local Authority of any private fostering or planned/suspected private fostering arrangements affecting the students. Staff and volunteers must alert the DSL to any possibility that a child or young person is in a private fostering arrangement, or is likely to be placed in a private fostering arrangement. The DSL must inform the Local Authority.
- 2.11 **Bullying (including cyber bullying, sexting and banter)** - is also abusive and all staff have a responsibility to act promptly in accordance with the School's Anti-Bullying Policy where bullying is evident or suspected.

Peer on peer sexual violence and sexual harassment - Sexual violence and sexual harassment can occur between two children of any age and gender and between children of the opposite or the same gender from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. As set out in Part one of KCSiE 2021, all staff working with children are advised to maintain an attitude of 'it could happen here'.

While it is important that **all** victims are taken seriously and offered appropriate support, staff are trained to be aware that it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

This policy largely refers to sexual violence and sexual harassment between pupils/students at the School. However, there may be occasions when pupils report sexual violence and/or harassment perpetrated by other young people who attend a different educational provision. In that situation, the DSL will liaise with the DSL at the alleged perpetrator(s) school/college as well as the victim's parents, the Police and Children's Social Care. Support for the victim will be provided as described below, irrespective of which educational provision the alleged perpetrator(s) attends.

What is sexual violence and sexual harassment? When referring to sexual violence, this policy uses the definitions of sexual offences in the Sexual Offences Act 2003.

Sexual harassment in the context of peer-on-peer behaviour is unwanted conduct of a sexual nature that can occur online and offline. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Online sexual harassment may happen on its own or as part of a wider pattern of sexual harassment and/or sexual violence. Sexual harassment creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence. The School therefore recognises the importance of recognising the nature of identifying and challenging sexual violence and sexual harassment in its wider approach to safeguarding and promoting the welfare of children; through policies and through the curriculum.

The School will respond to reports in accordance with Part Five of Keeping Children Safe in Education 2021.

2.12 **The sharing of nudes and semi-nude imagery ('sexting')**

The School will act in accordance with advice endorsed by DfE 2020 'Sharing nudes and semi-nudes: advice for education settings working with children and young people':

<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>.

All incidents of youth produced sexual imagery (YPSI) will be dealt with as safeguarding concerns. The primary concern at all times will be the welfare and protection of the young people involved. A summary of how the school will respond can be found here:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/947546/Sharing_nudes_and_semi_nudes_how_to_respond_to_an_incident_Summary_V2.pdf

Aggravated incidents involve criminal or abusive elements beyond the creation, sending or possession of sexual images created by young people. These include possible adult involvement; criminal or abusive behaviour by young people such as sexual abuse, extortion or threats; malicious conduct arising from personal conflicts; coercion; an imbalance of power, e.g. an older student pressurising a younger or vulnerable student to create and share an indecent image; or creation or sending or showing of images without the knowledge or against the will of a young person who is pictured. Aggravated incidents of sexting will usually be referred to Warwickshire's Integrated Front Door for advice about whether or not a response by the Police and/or Children's Social Care is required.

- 2.13 **Self-Harm** – Incidences of self-harm should be reported to the DSL or Dep DSLs. In order that the most effective support for the child can be put in place. The DSL or Dep DSLs or the Senior School Counsellor will provide support for staff or students who may be distressed as a result of witnessing self-harm.
- 2.14 **Eating Disorders** – Suspected eating disorders should be urgently reported to the Medical Team and the DSL. Delay in reporting can result in serious impairment to health and significantly extended recovering periods.
- 2.15 **Radicalisation and Extremism** – The School fully recognises its obligations under the Prevent Duty – June 2015. Any concern that a child or young person may be exposed to any form of possible extremism, extremist ideology and or radicalisation (including religious or right wing ideologies) must be treated as a safeguarding concern and reported to the DSL, CHANNEL, children's social care or the Police as appropriate. The School expects all staff, volunteers, governors, visiting practitioners, contractors and individuals or agencies that hire School premises to behave in accordance with the school's Staff

Behaviour Policy (code of conduct), will challenge the expression and/or promotion of extremist views and ideas by any adult on school premises or at school events and, when necessary, will make appropriate referrals in respect of any such adult.

Parents and staff may find the website www.educateagainsthate.com informative and useful.

2.16 **Domestic Violence and Abuse** – is defined by the Government as any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence of abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

It is recognised that it is harmful for a child to live in an environment where domestic violence or abuse is taking place, even if that violence or abuse is restricted to times when the child is asleep or absent. Any concerns that a child is in this situation must be referred to the DSL.

The School works in partnership with Warwickshire Police and Warwickshire Children’s Services to support pupils who are affected by incidents of domestic violence and abuse. This scheme is called Operation Encompass.

When the Police attend any incident of domestic violence or abuse in any household in which a pupil of the school lives, the Head and the DSL will receive a confidential and secure Email on the morning of the next school day, notifying them simply that there has been an incident and that the child may need support. On receipt of any such notification, the Head and/or DSL will ensure that teachers and other staff directly in contact with affected children support them with due kindness, care and sensitivity. In addition to supporting children, the process means that the school will also be able to offer parents and carers support as appropriate. The information will be managed and stored with the utmost sensitivity and discretion consistent with all other confidential safeguarding records.

2.17 **Child criminal exploitation: county lines** - Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation: can affect any child or young person (male or female) under the age of 18 years; can affect any vulnerable adult over the age of 18 years; can still be exploitation even if the activity appears consensual; can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence; can be perpetrated by individuals or groups, males or females, and young people or adults; and is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources. Any concerns that a child is in this situation must be referred to the DSL.

2.18 **Carrying knives/offensive weapons** – Bringing/carrying a knife or offensive weapon onto school premises is a criminal offence and immediate action will be taken including calling the police. Students suspected of bringing a knife or offensive weapon onto school premises may be searched in accordance with DfE

guidance 'Searching, screening and confiscation – Advice for headteachers, school staff and governing bodies – January 2018'.

- 2.19 **Gang Culture & Serious Violence** – If a member of staff suspects that a pupil is involved or at risk of becoming involved in gang culture, this is to be treated as a safeguarding concern and must be referred to the DSL who will seek advice and guidance from agencies and professionals in accordance with local authority safeguarding procedures.

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs. All staff should be aware of the associated risks and understand the measures in place to manage these.

- 2.20 **Upskirting** – typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm. It is now a criminal offence and may constitute sexual harassment. Any suspicion or concern must be reported as a safeguarding concern. Rugby School Group acknowledges the updated Voyeurism Act 2019, and the concerns around upskirting. This is a form of Peer on Peer abuse and may constitute a criminal act. Incidents, or suspicion, of upskirting will be reported to the police.

- 2.21 **Children staying with host families** – The School will work in accordance with the guidance contained in Keeping Children Safe in Education Annex D to ensure that all required measures are in place to safeguard any pupil who stays in accommodation that is arranged on their behalf by the school. The School does not arrange guardians but may, on occasions arrange for visiting students to stay with host families (e.g. language exchanges, touring sports teams). It is not possible for schools to obtain criminal record information from the DBS about adults abroad. Where pupils stay with families abroad, we will agree with partner schools a shared understanding of the arrangements in place. Staff will use their professional judgement to satisfy themselves that the arrangements are appropriate to safeguard the pupils, which will include ensuring pupils understand who to contact should an emergency occur, or a situation arise which makes them feel uncomfortable. We will also make parents aware of these arrangements.

- 2.22 **Looked After and Previously Looked After Children**

The most common reason for children becoming looked after is as a result of abuse or neglect. Children who were previously looked after potentially remain vulnerable. The School ensures that staff have the necessary skills and understanding to keep children who are looked after and children who were previously looked after safe and ensures that appropriate staff have information about a child's looked after status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The designated teacher for children who are looked after and previously looked after (the DSL) hold details of the social workers for all children who are looked after or were previously looked after; and the name and contact details of the Local Authority's virtual head for children who are looked after.

- 2.23 **Children with a social worker**

The School recognises that when a child has a social worker, that is an indicator that she/he may be more vulnerable to harm than other children as well as facing barriers to educational attainment in relation to attendance, learning, behaviour and poor mental health issues.

The School will take those issues and needs into account when making plans to support children who have a social worker.

Looked after children are more vulnerable than other children, often having poorer educational outcomes; therefore, ensuring their wellbeing, safety and welfare, helping them to reach their potential which includes the looked after child who is moving on. The School will also ensure that care leavers are supported with pathways including liaison with the local authority where a personal advisor will be appointed.

The Designated Teacher will ensure that the Personal Education Plan is maintained and will meet with Looked After Children in order to monitor the extent to which their educational, emotional and physical needs are being met. They will also ensure that the appropriate team around the looked after child is provided with appropriate information and will ensure that progress and development are monitored. The Designated Teacher will work in accordance with the statutory guidance and will maintain an active and up to date link with key services, including the Virtual School Head, Social Workers and PEP Coordinator.

3 RESPONSE TO ALLEGATIONS OR SUSPICIONS OF ABUSE

If a child is in immediate danger or is at risk of harm a referral should be made to children's social care and/or the police immediately. Whilst the referral is usually made by the DSL it is important to note that anyone can make a referral. [See Appendix 1 for summary chart]. The DSL should be informed as soon as possible that a referral has been made.

- 3.1 All allegations of child abuse involving the School community will be taken seriously and dealt with urgently. Allegations may relate to matters within school or indeed outside school or at home. As stated in the Children Act, the welfare of the child is of paramount concern.
- 3.2 Wherever possible and safe to do so, the child's wishes will be taken in to account when determining the actions to be taken to address safeguarding concerns.
- 3.3 The School will make arrangements as appropriate for the emotional and spiritual support of children and staff affected by a child protection issue. This support is most often given by a school Counsellor, or by referrals to external agency emotional support. The School Chaplaincy team is available to provide spiritual support.
- 3.4 The DSL/Dep DSL or Head if appropriate, will ensure that a referral of allegations or suspicions of abuse has been made to the local Children's Social Care child protection team and/or the police, within 24 hours (in writing or with written confirmation of a telephone referral), if the child is believed to be suffering or is likely to suffer, significant harm. Where a child is believed at imminent risk of significant harm the Police will be contacted immediately. The DSL will liaise with Children's Social Care and the Police during any child protection investigation. The DSL will also make referrals to Children's Social Care for children believed to meet the definition of a child in need under the Children Act 1989 (... a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services: or a child who is disabled). The DSL will also work with families to make Early Help referrals.
- 3.5 Where a child 'at risk' or 'in need' requires support from more than one agency the DSL will engage with the most appropriate support system, e.g. Common Assessment Framework (CAF), Team Around the Child (TAC) or Early Help Assessment (EHA) in accordance with LSCB procedures and Working Together to Safeguarding Children, July 2018.
- 3.6 Where there is an allegation of peer on peer abuse and there is reasonable cause to suspect that a child is suffering, or is likely to suffer significant harm, a referral will be made to local agencies in accordance with LSCB threshold guidance. All children involved in peer on peer abuse, victim or perpetrator, will be treated

as being 'at risk'. The DSL or Dep DSL will investigate such allegations in consultation with children's social care and/or the police where appropriate. Further actions will follow procedures set out in the Anti-Bullying Policy, including recording and investigating such instances.

- 3.7 Whilst referrals would usually be made as described in 3.4 it is important to note that anyone can make a referral. Contact numbers for making referrals to Children's Social Care are included on page 2. The home address of the child or young person who is the subject of the referral will determine which county to call.
- 3.8 As a Registered Provider (EYFS) the School will notify Ofsted as soon as reasonably practicable, but at the latest within 14 days, of any allegations of serious harm or abuse by any person living, working or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), or of any other abuse which is alleged to have taken place on the premises, and the action taken in respect of the allegations.
- 3.9 The DSL will make use of the LSCB Escalation Policy and Process where it is felt that concerns for a child or young person have not been addressed.
- 3.10 The Head must be informed of any allegation of abuse against a member of staff or volunteers as a matter of urgency. This may be via the DSL. The Local Authority Designated Officer LADO will be informed within 24 hours. Allegations against the DSL must be made to the Head (who will inform the LADO). If the allegation is against the Head then the person receiving the allegation should immediately inform the Chair of the Governing Body (who will inform the LADO) without first having informed the Head. In all of the above circumstances, contact with the LADO will be made prior to any investigation being undertaken. Following the discussion with the LADO, the member of staff concerned may be made aware of the allegation. In a case where serious harm is alleged or a crime has been committed, the police should be informed from the outset.
- 3.11 Following the outcome of the investigation appropriate actions will be taken. These may include disciplinary procedures, risk assessments, suspension of staff or students and/or relocation of involved staff if they are resident within school.
- 3.12 The Heads will be responsible for informing Ofsted and the DfE of any information that is required to go on its register. The Head will report to the Disclosure Barring Service (DBS), immediately about any person whose services are no longer used because he or she is considered unsuitable to work with children (whether employed, contracted, a volunteer or student). Where a teacher has been dismissed (or would have been dismissed had he/she not resigned) a referral will be made to the Teaching Regulation Agency. This will include reasons such as unacceptable professional conduct, conduct that may bring the profession into disrepute and any conviction for a relevant offence.
- 3.13 The result of an investigation may be inconclusive, there may or may not be a prosecution, or it may be decided that a person's behaviour has been ill-advised and foolish rather than criminal.
- 3.14 Allegations may be shown to be unfounded or malicious. In these cases the Head will find appropriate means to make clear that the person has been exonerated.
- 3.15 The DSL is required to keep a central confidential record of all reported incidents including the original notes of the first conversation with the complainant. These records are to remain separate from the child's general school record. The DSL must forward copies of safeguarding files securely to the DSL at a child's new school, in the event of them leaving the School. Letters are sent requesting that child protection records held by previous schools are forwarded securely to the DSL, as part of the admissions process for

all new students to Rugby School and Bilton Grange. A copy of the letter and form can be obtained on request.

- 3.16 Staff who, in good faith, report any concern or allegation about school practices or behaviour of colleagues which prove to be unfounded will be provided with immunity from retribution or disciplinary action for such “whistleblowing”. Further detail is given in the staff policy on Whistleblowing.
- 3.17 If a resident staff member is suspended due to safeguarding concerns, then alternative accommodation will be found for them, which will be off-site.
- 3.18 Concerns that a safeguarding or child protection matter is not being handled appropriately should be referred to the Head or DSLs (Deputy Head/Assistant Head Pastoral). Alternatively the NSPCC Whistleblowing Helpline offers advice and support to professionals with concerns over how child protection issues are being handled in their own organisation or in another organisation (contact details are on page 2).

4 GOOD PRACTICE GUIDELINES (To be read in conjunction with the Staff Code of Conduct)

- 4.1 The School requires all staff to maintain the highest professional standards in their work and relationships with children. The following recommendations provide a framework within which children should be safe from harm and adults protected from false allegations.

Be prepared for your colleagues to remind you if you forget one of these guidelines, and be prepared to help a colleague by advising them in return. The more trusting and open the relationships between staff, the safer our children and young people will be. However, if a colleague fails to amend inappropriate behaviour to meet the guidelines, colleagues should be prepared to report them in the interests of safeguarding children.

4.2 Staff reporting concerns about a colleague or other adult who works with children (Whistleblowing)

Staff who are concerned about the conduct of a colleague – including visiting practitioners and volunteers – towards a pupil are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood a situation and they will wonder whether a report could jeopardise a colleague’s career. All staff must remember that the welfare of the child is paramount.

The School’s **whistleblowing** policy enables staff to raise concerns or allegations, initially in confidence, and for a sensitive enquiry to take place.

Staff are expected to report all concerns about poor practice or possible child abuse by colleagues - including what may seem minor contraventions of the School’s staff behaviour policy (code of conduct) – to the Head; to facilitate proactive and early intervention in order to maintain appropriate boundaries and a safe culture that protect children and reduce the risk of serious abuse in school.

The recommended format for all staff in schools to record any such poor practice or possible child abuse by colleagues or other adults who work with children is the pro forma ‘*Logging A Concern about a member of staff*’ (found on the intranet).

All such forms should be **passed directly to the Head**. Alternatively, staff are free to approach the Head directly to discuss their concerns.

Concerns or complaints about the Head, Ex Head or Ex Deputy Head should be reported to the Chair of Governors, whose contact details are displayed in the staff room for any member of staff to use in such

an instance. The 'Logging a concern about a member of staff' form on the intranet should also be used for that purpose as above.

Staff may also report concerns about suspected abuse or neglect directly to Children's Social Care or the Police if they believe direct reporting is necessary to secure action to safeguard children.

Staff can also contact the Local Authority Designated Officer (LADO), who is responsible for the co-ordination of responses to allegations against people who work with children (see contact and referral details in section 16 below). The LADO's contact details are displayed on the safeguarding noticeboard in the staff room.

The NSPCC whistleblowing helpline is also available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 between 8.00a.m. and 8.00p.m, Monday to Friday or e mail help@nspcc.org.uk. Information is also available on the NSPCC website at <https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/>.

The NSPCC whistleblowing helpline and contact numbers for Children's Social Care, the Police and the LADO are all displayed in the staff room.

4.3 **Managing allegations against staff**

When an allegation is made against a member of staff, set procedures must be followed. The full procedures for dealing with allegations against staff can be found in Part 4 of *Keeping Children Safe in Education 2021* and para 1.14 of WS inter-agency safeguarding procedures *Allegations against staff or volunteers*:

<https://www.safeguardingwarwickshire.co.uk/safeguarding-children/i-work-with-children-and-young-people/interagency-safeguarding-procedures>.

Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress.

Suspension is not the default option and alternatives to suspension will always be considered. However, in some cases staff may be suspended where this is deemed to be the best way to ensure that allegations are investigated fairly, quickly and consistently and that all parties are protected. In the event of suspension, the school will provide support and a named contact for the member of staff.

Staff, parents and governors are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing, including content placed on social media sites.

Allegations concerning staff who no longer work at the school or historical allegations will be reported to the Police.

In accordance with *Keeping Children Safe in Education 2021*, the school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

As required by *Keeping Children Safe in Education 2021* all allegations in respect of an individual who works at the school, including supply teachers, volunteers and contractors that fulfil any of the following criteria will be reported to the (LADO) within one working day:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;

- behaved towards a child or children in a way that indicates they may pose a risk of harm to children;
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. (Includes behaviour that may have happened outside of school that might make an individual unsuitable to work with children, this is known as transferable risk)
- Behaved in a way that has harmed a child, or may have harmed a child and/or;
- Possibly committed a criminal offence against or related to a child and/or;
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children and/or;
- Behaved or may have behaved in a way that indicates that may not be suitable to work with children. (includes behaviour that may have happened outside of school or college, that might make an individual unsuitable to work with children, this is known as transferable risk).

The LADO's contact number is 01926 745376. Referrals to the Local Authority Designated Officer should be submitted on a Position of Trust (POT) MARF form and sent to lado@warwickshire.gov.uk.

NB it is the Head's responsibility to contact and refer to the LADO when necessary. The only exception is when the allegation is against the Head/Executive Head/Executive Deputy Head, in which instance the nominated governor will undertake that responsibility.

The Children Act stresses the importance of children being able to share their concerns with adults and being able to confide in them. All staff involved in the care of students (boarders especially) should strive to create a supportive and caring environment. The following list constitutes the School's recommended good practice guidelines (see also the Staff Code of Conduct):

- Treat children and young people with the respect and dignity befitting their age.
- Listen to what children and young people have to say.
- Watch your speech, tone of voice and body language.
- Behaviour management in line with school protocols (Rugby School and Bilton Grange Policies)
- You must not permit abusive peer activities e.g. initiation ceremonies, ridiculing, bullying.
- Respect a child's privacy.
- You must not scapegoat, ridicule or shun any child.
- You must not show favouritism to any one child.
- You must not allow children to involve you in excessive attention-seeking.
- You must not give lifts to children on their own except in exceptional and legitimate circumstances for the safety and wellbeing of the child. Regular arrangements must be disclosed [Line Manager] and must be discussed with the DSL.
- Avoid giving personal contact details to students.
- You must not share sleeping accommodation with children.
- Do not allow unknown adults access to children. Visitors should be accompanied by a known person.

4.4 Staff who are required to work on a one to one basis with students, such as instrumental teachers, sports coaches etc should be particularly vigilant in considering how their actions may be perceived by a student.

4.5 Within the EYFS setting, the use of personal mobile phones and other potential video recording equipment is not permitted by parents, visitors or staff whilst on the EYFS premises. A notice to parents to this effect is also displayed within Bilton Grange Nursery. Bilton Grange staff who take photographs of children playing for the purpose of publicity and record keeping / assessment must use school cameras and ensure the photos are stored securely and available to all relevant staff in line with the Images Policy.

- 4.6 Where there is evidence or an allegation of abuse by one or more students against another student it is noted that a bullying incident should be treated as a child protection concern when there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm (See Anti-Bullying Policy).

5 INAPPROPRIATE ADVANCES

- 5.1 Children can sometimes make suggestive approaches to an adult. For whatever reason, they may act in an inappropriate manner. Sometimes, inappropriate physical contact can be made either intentionally or accidentally.
- 5.2 It is vital that members of staff take the responsibility to:
- Tell the child that his or her language or behaviour is unacceptable.
 - Tell the DSL/Dep DSL about the incident, however, embarrassing this is.
 - Record the incident, indicating what was said and/or done. This is a necessary safeguard if accusations are made at a later stage.

The member of staff and the DSL/Dep DSL should decide on the appropriate course of action. It may be necessary for the DSL/Dep DSL and/or the member of staff to discuss the incident with the Head and/or to seek advice from Children's Social Care.

6 CONFIDENTIALITY

- 6.1 The highest level of confidentiality should be maintained at all times in relationships with both adults and children. You should, however, make it clear that there are certain circumstances, if a child is suffering or is likely to suffer harm, when other people will need to be told so that the child can be protected & confidentiality cannot be promised.
- 6.2 It is important not to agree to blanket confidentiality in any discussion or counselling. If an allegation has been made against someone it is very important that as few people as possible know whilst the allegation is being investigated. This protects both the accuser and the accused.

Operation Encompass

Operation Encompass operates in the majority of police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the DSL) in school before the child or children arrive at school the following day. This ensures that the School has up to date relevant information about the child's circumstances and can enable support to be given to the child accordingly to their needs. Warwickshire Police is signed up to Operation Encompass as is the School.

7 HEARING A CHILD ABUSE DISCLOSURE

- 7.1 The School is committed to liaising with the statutory child protection agencies when dealing with allegations of abuse. Any allegation heard will be reported without delay to the DSL/Dep DSL, who will follow appropriate procedures for hearing a child protection disclosure. However, any member of staff or volunteer may be in a position where a child wishes to disclose to them issues relating to abuse. It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual. Their abuser may have threatened what will happen if they tell. They may have lost all trust in adults. Or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.

7.2 The following procedures must be adopted when hearing a child abuse disclosure:

- The listener must take steps to protect the complainant from immediate harm by contacting the DSL/Dep DSL, or the Head.
- As soon as reasonably possible, preferably immediately after the conversation has taken place, the listener will make a hand written record of the conversation which must be forwarded to the DSL. Such a statement will include a note of the date and time and will be signed by the author. The content must be verified with the child to ensure it is an accurate account of the disclosure.
- Do not give a guarantee of confidentiality. You have a duty to tell the appropriate people if you are told of incidents of abuse. Do explain that you will only tell those who have to know.
- Give reassuring nods or words of comfort – **'I'm glad you told me'/'Thank you for telling me'; 'You're doing very well'; 'I believe you'; 'What happened to you is not your fault'/'This isn't your fault'; 'I'm going to do what I can to help you'**;
- Do not be afraid of silences – staff must remember how hard this must be for the pupil;
- **Under no circumstances** ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the pupil's mother think about it; (**however**, it is reasonable to ask questions to clarify understanding and to support a meaningful referral if that is required, e.g. 'when did this happen', 'where did this happen?')
- Do not ask leading questions. Limit any questioning to the minimum necessary to seek clarification only. Stick to questions of the type 'What is it you want to tell me?' don't ask questions like 'Why do you think this happened?'
- If there is an allegation made against a member of staff or volunteer, it must be reported immediately in accordance with the procedures outlined in paragraph 3.10 of this policy.
- Discuss with the DSL/Dep DSL or Head whether steps need to be taken to protect the complainant.
- **Do not carry out an investigation yourself.** Children's Social Care and police staff are specifically trained in appropriate procedures and you could damage or prejudice criminal proceedings by interviewing people yourself.

The School will carefully consider any report of sexual violence and/or sexual harassment. The DSL/Deputy DSL is likely to have a complete safeguarding picture and be the most appropriate person to advise on the School's initial response. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the School's duty and responsibilities to protect other children;
- the nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour;
- the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children. For example, is the alleged perpetrator(s) significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);
- that sexual violence and sexual harassment can take place within intimate personal relationships between peers;
- are there ongoing risks to the victim, other children, adult students or school staff; and
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

- 7.3 It is crucial never to assume that an accusation of abuse against someone you know well and whom you trust is bound to be wrong. Children and young people often tell their peers, rather than staff or other adults, about abuse. It is important to make sure that senior students (e.g. prefects and young people leading activities for others) as well as responsible adults are aware of these points.

Notifying parents

The School will normally seek to discuss any concerns about a pupil with their parents. This must be handled sensitively and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure.

Our focus is the safety and wellbeing of the pupil. Therefore, if the School believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will be sought first from Children's Social Care.

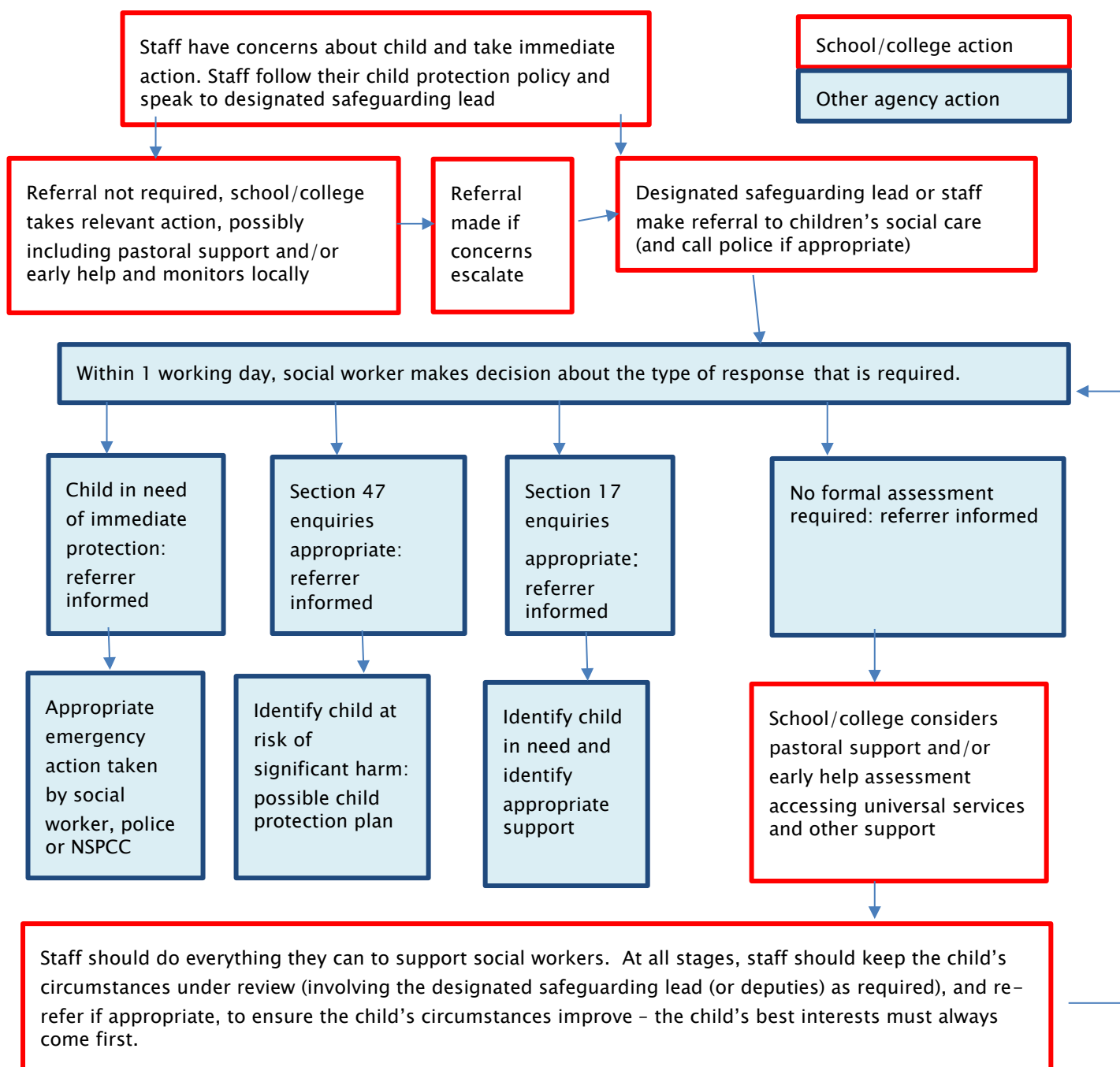
8 TRAINING

- 8.1 DSL and Dep DSLs must retrain at least every two years, and are responsible for staying up to date with changes in legislation and best practice.
- 8.2 The DSL is responsible for ensuring that safeguarding training (including Prevent Duty training) is delivered to new staff and volunteers as part of their induction.
- 8.3 The DSL is responsible for ensuring that refresher safeguarding training is delivered to all staff (including the Head) and volunteers at least annually.
- 8.4 The DSL is responsible for ensuring that all staff are trained to manage a report of peer on peer sexual violence and sexual harassment.
- 8.5 The DSL is responsible for delivering safeguarding training to the Rugby School student body via the RSHE programme, peer mentoring and leadership training programmes.
- 8.6 The DSLs are responsible for ensuring that students are taught to keep themselves safe online via RSHE, workshops and computing lessons.
- 8.7 The RSHE programme is regularly adapted in order to help counter emerging safeguarding trends.
- 8.8 ALL staff (including the Head), governors and volunteers in the School have read Keeping Children Safe in Education (Part 1)
- 8.9 ALL staff (including the Head), governors and volunteers receive induction training, which includes familiarisation with the Code of Conduct (for staff); the Whistleblowing Policy; Keeping Children Safe in Education (part 1); What to do if you're worried a child is being abused – March 2015; E-safety Policy; Acceptable use of Technology Policy; and the Child Protection & Safeguarding Policy; Safeguarding response to children who go missing from education; Discipline and Rewards Policy (student behaviour policy).
- 8.10 Students are provided with age appropriate sex and relationships education through the RSHE programme.

9 SAFER RECRUITMENT PROCEDURES

The School operates safer recruitment procedures as outlined in the Safer Recruitment Policy. All new employees are subject to a Disclosure and Barring Service check at the Enhanced Disclosure level and EEA checks. The same level of pre-employment check is also carried out on any family members over the age of 16 if the prospective employee's employment requires them to be resident within the school campus. Similarly all qualifying volunteers including Governors, and contractors, such as bus drivers, who are likely to come into contact with students are checked at the same level. In order to verify the validity of written references, the School will make direct contact with a referee to ensure the written reference is genuine.

Appendix 1: Actions where there are concerns about a child (from Warwickshire Safeguarding Partnership)



Authorised:	
Date:	September 2021