

# Safeguarding and Child Protection Policy



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<b>Updated:</b>	21 February 2017
<b>Review:</b>	September 2017 or as necessary
<b>Responsible Member of Staff:</b>	Jonny Timms, Designated Safeguarding Lead (Deputy Headmaster - Pastoral)
<b>Responsible Governor:</b>	Liz Hungin

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## **Summary Statement of Policy:**

Caldicott is dedicated to safeguarding and promoting the health, safety and welfare of all our children, which is of paramount importance to all the adults who work in our school. Our children have the right to protection, equal opportunities and a right to be safe in our school.

**Links to other policies:** This policy should be read in conjunction with the school's Behaviour and Anti-bullying Policies.

## **Designated Safeguarding Leads (abbreviations to be applied throughout the document)**

"Designated Safeguarding Lead"	-	shall be referred thereafter as "DSL"
"Deputy Designated Safeguarding Lead"	-	shall be referred thereafter as "DDSL"
"Additional Designated Safeguarding Lead"	-	shall be referred thereafter as "ADSL"
"The Local Authority Designated Officer"	-	shall be referred thereafter as "LADO"

## **Contact Details for Safeguarding Team**

### **Mr Jonny Timms, Designated Safeguarding Lead**

Direct Line: 01753 649310 /Mobile 07590 624856

[JT@caldicott.com](mailto:JT@caldicott.com)

### **Ms Theroshene Naidoo, Acting Head**

Direct Line : 01753 649318

[TRN@caldicott.com](mailto:TRN@caldicott.com)

### **Ms Katy Rule, Deputy Designated Safeguarding Lead**

Direct Line: 01753 649300

[KYR@caldicott.com](mailto:KYR@caldicott.com)

### **Mr Charlie Langley, Additional Safeguarding Lead**

Direct Line: 01753 649314

[CWL@caldicott.com](mailto:CWL@caldicott.com)

### **Ms Emma Hourston, Additional Safeguarding Lead**

Direct Line: 01753 649300

[e.i.hourston@caldicott.com](mailto:e.i.hourston@caldicott.com)

### **Mrs Liz Hungin, Governor responsible for Safeguarding**

Direct Line: 01494 681187

[liz@hungin.co.uk](mailto:liz@hungin.co.uk)

## Reporting on Compliance and Effectiveness

The policy is reviewed as necessary and is ratified annually at the Governors' meeting in November and this is recorded in the minutes.

### 1. Policy Statement

- a) The school is committed to safer recruitment in education. (see the Safer Recruitment Policy, Jan 2017)
- b) This policy and its implementation procedures set out the arrangements to safeguard and promote the welfare of pupils at the school, and have been prepared in compliance with, and with regards to:

Reference Document	Source
<ul style="list-style-type: none"> <li>• The Education Acts</li> </ul>	Legislation.gov.uk
<ul style="list-style-type: none"> <li>• Education Regulations 2016</li> <li>• Independent Schools Standards (5<sup>th</sup> January 2015)</li> </ul>	Legislation.gov.uk DfE
<ul style="list-style-type: none"> <li>• Safeguarding Vulnerable Groups Act 2006</li> </ul>	Legislation.gov.uk
<ul style="list-style-type: none"> <li>• The Protection of Freedoms Act 2012</li> </ul>	Legislation.gov.uk
<ul style="list-style-type: none"> <li>• The Children Act 2004</li> </ul>	Legislation.gov.uk
<ul style="list-style-type: none"> <li>• <i>What to do if you are worried a Child is being Abused</i> March 2015</li> </ul>	Department for Education (hereafter "DfE")
<ul style="list-style-type: none"> <li>• <i>Working Together to Safeguard Children</i> March 2015 (A guide to inter-agency working to safeguard and promote the welfare of children)</li> </ul>	DfE
<ul style="list-style-type: none"> <li>• <i>Keeping Children Safe in Education</i> September 2016</li> </ul>	DfE
<ul style="list-style-type: none"> <li>• <i>Information Sharing: advice for practitioners providing safeguarding services</i> March 2015</li> </ul>	DfE
<ul style="list-style-type: none"> <li>• DBS Barring Referral Guidance – updated 12 May 2016</li> </ul>	Disclosure and Barring Service (hereafter "DBS")
<ul style="list-style-type: none"> <li>• <i>Independent Schools Inspectorate Handbook</i> 2016 – the regulatory requirements (and as amended)</li> <li>• <i>Integrated Handbook – Framework</i> 2016</li> </ul>	Independent Schools Inspectorate (hereafter "ISI")
<ul style="list-style-type: none"> <li>• <i>National Minimum Standards for Boarding Schools</i>, April 2015</li> </ul>	DfE
<ul style="list-style-type: none"> <li>• <i>Teacher misconduct: regulating the teaching profession</i> Updated 27 July 2016 (and related guidance)</li> </ul>	DfE National College for Teaching and Leadership (part of DfE)
<ul style="list-style-type: none"> <li>• <i>Use of Reasonable Force in Schools</i> 2013</li> </ul>	DfE
<ul style="list-style-type: none"> <li>• <i>Information Commissioner's Office Data Sharing Code of Practice</i> May 2011</li> </ul>	Information Commissioners Office (hereafter "ICO")
<ul style="list-style-type: none"> <li>• <i>Preventing and Tackling Bullying</i> October 2014</li> </ul>	DfE

<ul style="list-style-type: none"> <li>• <i>Prevent Duty Guidance, Channel Guidance, and Prevent Departmental Advice</i> (June 2015).</li> </ul>	DfE
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- c) It is the responsibility of all members of staff, teaching and non-teaching, to play an active role in ensuring that children who have specific needs e.g. those suffering from issues such as eating disorders, mental health, and body image and self-harm are supported along with those children who are at risk of harm or are suffering significant harm. The DSL (or in their absence, the DDSL or ADSLs) will contact Social Services for support in all of these areas.
- d) The governing body takes seriously its responsibility under section 157 of the *Education Act* (2002) to safeguard and promote the welfare of pupils; and to work together with other agencies to ensure adequate arrangements within our school to identify, assess, and support those children who are suffering from harm.
- e) All members of staff are expected to be aware of and follow the school Safeguarding and Child Protection procedures which follow South Bucks Child Protection and Safeguarding Procedures. The procedures have been updated to comply with 'Working Together to Safeguard Children' (March 2015).
- f) In particular, staff need to be aware of their duty to report concerns, the guidance for identifying child abuse, what to do if a child makes an allegation of child abuse and issues around confidentiality.
- g) Assurance is obtained that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the school's pupils on another site (for example, in a separate institution).
- h) A copy of this policy is available on the school's website. This policy also links with our policy on "images of pupils for record keeping and promotional purposes" (see Appendix 1) and Prevent policy (see Appendix 2).

## 2. Key Points

- a) Each member of staff has Safeguarding and Child Protection Policy training and receives refresher training at least once every two years, the content and frequency of which is acceptable to the local authority.

Temporary staff and voluntary staff are also made aware of the school's arrangements. The next training for all staff in regular activities (part time and full time) will be in September 2018. The training for school Governors will be in June 2018.

- b) Members of the school do not investigate allegations of child abuse themselves as all allegations will be reported to South Bucks Local Safeguarding Children Board and, if necessary, the police.
- c) Allegations against staff, volunteers, the DDSL or the ADSLs should be reported to the DSL. If the DSL is absent, the allegation should be passed to the Acting Head if the Acting Head is away, then passed to the Chairman of Governors. If the allegation concerns the DSL, the person receiving the allegation should immediately inform the Acting Head, if she is not available, then the Chairman of Governors. If the allegation concerns the Acting Head, the person receiving the allegation should immediately inform the Chairman of Governors, without notifying the Acting Head first. In all cases via either the DSL, DDSL, ADSL, or the Acting Head, the Local Authority Designated Officer (hereafter "LADO") must be promptly informed. In case of serious harm, the police should be informed from the outset.

- d) When an allegation is made against a member of staff or volunteer:
- I. If the member of staff concerned is resident, then the school will arrange for such member of boarding staff to be provided alternative accommodation off-site pending an investigation of a child protection nature.
  - II. The school must report to the Disclosure and Barring Services (DBS) promptly and at least within one month of leaving the school, any person (whether employed, contracted, a volunteer or student) whose services are no longer used because he or she was involved in any allegation of child abuse. It is important that reports include as much evidence about the circumstances of the case as possible. Failure to make a report constitutes an offence and the school may be removed from the DfE register of independent schools.
  - III. The school is also under a duty to consider making a referral to the National College for Teaching and Leadership (NCTL) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. The reasons such an order would be considered are: “unacceptable professional conduct”, “conduct that may bring the profession into disrepute” or a “conviction, at any time, for a relevant offence”. Further guidance is published on the NCTL website. Where a referral has been made to the DBS, it is also necessary for a referral to be made to NCTL.
- e) The following staff from the Safeguarding team at Caldicott and have special responsibility for Safeguarding and Child Protection matters;
- Mr Jonny Timms, Designated Safeguarding Lead
  - Ms Theroshene Naidoo, Acting Head
  - Katy Rule, Deputy Designated Safeguarding Lead
  - Mr Charlie Langley, Additional Safeguarding Lead
  - Ms Emma Hourston, Additional Safeguarding Lead
  - Mrs Liz Hungin, Governor responsible for Safeguarding
- f) Safeguarding and Child Protection is integrated into the school ethos. The school operates Safer Recruitment procedures, follows the Independent Schools Standard Regulations and has a well-established anti-bullying policy. It also has regard to ‘*Working Together to Safeguard Children (2015)*; *Keeping Children Safe in Education (2016)*).

### **3. Duty to Report**

Any member of staff who either knows of, is told of, or strongly suspects any incident of abuse occurring in the school between pupils, or to a child of the school at home or outside

the school, must report the information the same day to the DSL or in his absence to the DDSL or ADSLs who will immediately contact Children's Social Care Services.

### **Investigations into Child Abuse are Always Externally Managed**

- a) Members of the school do not investigate reports of abuse themselves.
- b) Alleged victims, perpetrators, those reporting abuse and others involved will not be interviewed by members of staff beyond the point at which it is clear that there is an allegation of abuse.
- c) The interviewing of children and adults, if necessary, will be carried out externally by specially trained staff only, following procedures in line with government requirements and in the light of the recommendations of past inquiries into the handling of child abuse issues.
- d) The school acknowledges that its policy will inevitably lead to some investigations by external agencies being triggered, which do not substantiate the allegations made, as well as those that do.
- e) It is a basic assumption that it is better to endure some 'false alarms' than to fail to initiate specialist investigation of instances of real abuse by Children's Social Care Services:

Contacts at the local authority (Buckinghamshire County Council):

- |   |                      |
|---|----------------------|
| • Education Safeguarding Advisory Service   | 01296 383912         |
| • Local Authority Designated Officer (LADO) | 01296 382070         |
| • Social Care First Response Team           | 0845 4600 001        |
| • Family Resilience Service Referral Line   | 0845 4600 300        |
| • Social Care - Out of Hours                | 0800 999 7677        |
| • Thames Valley Police                      | 999 (in emergency)   |
| (Child Abuse Investigation Unit)            | 101 (non- emergency) |

Local Safeguarding Children Board

[www.bucks-lscb.org.uk](http://www.bucks-lscb.org.uk)

**Should you wish to contact the local authority directly, you can access their contact details from the DSL and through an online search.**

### **Confidentiality**

- a) We regard all information relating to individual child protection issues as confidential, and we treat it accordingly. We pass information on to appropriate persons only.
- b) We comply with the government requirements set out in '*Working together to safeguard children*' (2015), '*Keeping Children Safe in Education*' (2016). Working notes are subject to disclosure, and may be passed on to the LADO and used as evidence in court.
- c) Adults at the school should never give absolute guarantees of confidentiality to children or adults wishing to tell them about something serious.
- d) They should however, assure the child or adult that:
  - i. They will only pass on information to the minimum number of people who must be told in order to ensure that the proper action is taken.

ii. They will never tell anyone who does not have a clear 'need to know'. They will take whatever steps they can to protect the informing child or adult from any retaliation or unnecessary stress that might be feared after a disclosure of alleged abuse has been made.

#### **4. When an allegation of abuse is made**

Any staff member to whom an allegation of abuse is made should:

- a) Not promise confidentiality.
- b) Limit any questioning to the minimum necessary to seek clarification only, strictly avoiding 'leading' the child or adult who has approached them by making suggestions or asking questions that introduce their own ideas about what may have happened.
- c) Not ask questions like "Did he do x to you?" using instead a minimum number of open questions such as 'Tell me what happened'.
- d) Stop asking any more questions as soon as the child or adult has disclosed that he or she believes that something abusive has happened to him or her, or to someone else.
- e) Tell the informing child or adult that the staff member will now make sure that the appropriate people are brought in to follow the problem up (these will include the specialist social worker and that worker may need to involve the police).
- f) Ask the informing child or adult what steps they would like to be taken to protect them now that they have made an allegation and assure them that the school will try to follow their wishes.
- g) Refer the matter immediately, with all relevant details, to the DSL (the DDSL or one of the ADSLs) and if deemed appropriate the Governor with specific responsibility for Safeguarding, as above.
- h) If this cannot be done, in exceptional circumstances, the staff member should contact the LADO.
- i) Make a handwritten record as soon as possible, of what they have been told and make a copy of this available to the DSL (or the DDSL or the ADSLs).

#### **5. When an Allegation is passed on**

On receiving an allegation of abuse, including alleged abuse by one or more pupils against another pupil, the DSL (or the DDSL or the ADSLs) should:

- a) Take steps needed to protect any child involved from risk of immediate harm. This may involve allocating an appropriate member of staff, as far as possible a person chosen by the child him/herself, to stay with him or her. Similarly, an Inspector receiving an allegation of abuse at the school may stay with the child concerned until suitable arrangements for his or her protection are made.
- b) Not interview or investigate the allegation further, but refer the matter the same day to the local
- c) Speak personally to the Children's Social Care Services and not rely on leaving a message.
- d) Follow advice about contacting parents, other staff, police, doctor or alleged perpetrator or witnesses directly and agree any necessary next steps in relation to:
  - i. Informing a child's parents (there are circumstances where it would be inappropriate to inform parents immediately an allegation has been made).

- ii. Medical examination or treatment for the child (again, there are circumstances where medical evidence will be needed). Immediate protection may be needed for a child who has been the victim of abuse.
- e) Take immediate and appropriate steps to protect the child who has given information about abuse and any child against whom an allegation has been made (each of these may now be at risk).
- f) Inform other people at the school who need to know (including any other member of staff) of the allegation and its investigation. Experience has shown that knowledge of an allegation or impending investigation can lead to a serious risk to the informant from the alleged perpetrator, or 'covering up' of evidence that may be sought by police such as collections of child pornographic photographs, or to pressure being applied to others to remain silent.
- g) Inform the child or adult who made the initial allegation of what the next steps are to be, having agreed these with the Children's Social Care Services Advisor.
- h) Inform the Acting Head (unless she is the subject of the allegations or suspicions) of the allegations and the action taken as above, and agree necessary further action in line with these standards. It is the Acting Head who makes the decision whether to suspend from duty, pending investigation, any staff member who is alleged to have abused a child or children, taking into account the advice of the LADO or police.
- i) Take any steps for the longer-term protection and support of each child who has made allegations of abuse, or is alleged to have suffered from abuse, taking his or her wishes into account.
- j) Take any necessary steps to protect and support a child who is alleged to have abused another.
- k) Where the allegation has been made by a member of staff, remind them of the school Whistle-Blowing Policy that covers instances where an allegation has been made in good faith by any person or persons and such persons have complete immunity for their actions.

## **6. Disciplinary Action**

The school should consider taking, and if necessary will take, disciplinary action against any member of staff or agent of the school where it is believed that children are at risk of abuse from that member of staff, even in cases where there is to be no criminal prosecution.

## **7. Low Level Concerns**

- a) Where the school has 'low level' concerns that do not amount to allegations or suspicions of specific abuse, but which may indicate the possibility of abuse occurring, the DSL should discuss these with Children's Social Care Services.
- b) There may be times when staff, in the course of their duty may, in exceptional circumstances, have no option other than to use physical intervention to restrain children, either to stop them from harming themselves or others. Should this occur the Acting Head requires the member of staff involved in any such incident to report it to her (or in her absence the Deputy Head Pastoral). The Acting Head will make a record of the incident, in case the action is later questioned. In all and every instance where staff have used any physical intervention to restrain a child, the child's parents will be fully advised of the circumstances and the level of physical intervention applied the same day or as soon as

practicable (see BEHAVIOUR, REWARDS, SANCTIONS, DISCIPLINE AND EXCLUSIONS POLICY) – located school website/parents / policies and on the Staff Portal document - on the ISI Portal – Part 3, Welfare, Health & Safety of Pupils and other legislation - Behaviour Section 9a.

## **8. Record Keeping**

All records relating to Safeguarding and Child Protection are held in the Red Folder in the Acting Head's locked safe.

- a) All records relating to Safeguarding and Child Protection (adult) are held in a locked filing cabinet by the Acting Head.
- b) There is a separate Practice Guidelines document detailing the administration of the Child Protection file processing of documents therein. This is monitored by the school's Governing Body/Governor with oversight of The Safeguarding and Child Protection practice at school.

## **9. The Responsibilities of each role in the Safeguarding Team**

**The Designated Safeguarding Lead is responsible for:**

### **a) Procedure:**

- I. Holding and being conversant with current local and national Safeguarding and Child Protection procedures.
- II. Keeping up to date through training. It is a requirement that this takes place at least every two years.
- III. Reviewing and updating the school's Safeguarding and Child Protection policies and inter agency working. Any deficiencies or weaknesses in the policies and procedures must be remedied without delay.
- IV. Liaison over safeguarding matters with the local Children's Social Care Services.

### **b) Raising Awareness**

Ensuring that the school Safeguarding and Child Protection Policy is up-to-date (reviewed annually as a minimum), known and used appropriately:

- I. Briefing and guiding teaching and non-teaching staff on safeguarding matters. This includes the briefing of new staff as part of their induction, as well as part-time, Policy Safeguarding and Child Protection training at least every three years that is deemed acceptably by the local authority.
- II. Keeping close contact with all staff and maintaining awareness of Safeguarding and Child Protection and the need to raise any concerns immediately with the DSL (or in their absence, the DDSL or the ADSLs).
- III. Compliance and facilitation: ensuring that the Safeguarding and Child Protection procedures are followed within the school that each member of staff has access to the procedures and has an understanding of them.
- IV. The Safeguarding and Child Protection procedures must be available to parents of children in the school on request.

### **c) Managing Referrals**

- I. Receiving reports of alleged or suspected child abuse within the school, or reported by a child relating to incidents at home or outside the school, and referring these to:
  - a) The Children's Social Care Services
  - b) The Disclosure and Barring Service (where a person is dismissed or left due to risk or harm to a child) and
  - c) The police (cases where a crime may have been committed).
- II. Also, to take appropriate action in response, as set out below:
  - a) Keeping records
  - b) Passing on information to a new establishment when a child leaves the school
  - c) Liaising with the staff
  - d) Liaising with the Designated Governor

#### d) **Training**

- I. The DSL ensures that there are termly Safeguarding and Child Protection Policy briefings to all school staff.
- II. The DSL ensures that the DDSL, the ADSLs are appropriately trained.
- III. The DSL, DDSL and the additional ADSLs attend formal refresher training every two years.  
Such training was last undertaken by the DSL on: 13 January 2017 and the DDSL on: 4 January 2017. ADSLs training to be completed.
- iii. All school staff – part-time and full-time (including volunteers in regular activities) receive formal refresher Safeguarding and Child Protection Policy training every two years. Such training was last undertaken in September 2016. The next formal refresher training session is due to be undertaken in September 2018.
- iv. On appointment, all employees are given and asked to read the school Safeguarding and Child Protection Policy and Part 1 of KCSIE. They are then required to sign a declaration to say they have read, understood and agree to adhere to the Safeguarding and Child Protection Policy and part 1 of KCSIE. All staff who were employed prior to KCSIE being published have also signed a declaration to say they have read, understood and agree to adhere to part 1 of KCSIE.
- v. All new Governors are given Safeguarding and Child Protection Policy training when they are appointed. All Governors also receive formal refresher Safeguarding and Child Protection Policy training every three years. Such training was last undertaken in June 2016. The DSL also gives a report update every term in the full governors' meeting.

## 2. **The Governing Body is responsible for:**

Ensuring compliance with legal duties with relation to the management of Safeguarding and Child Protection in the school and that the policies, procedures and training in the school are effective and legally compliant. The governing body ensures that the following areas are appropriately managed:

### a) **Inter-agency working:**

Ensuring that the school contributes to inter-agency working (Working Together to Safeguard Children 2015)

- i. the school's Safeguarding and Child Protection arrangements take into account the procedures and practice of the local authority
- ii. a member of the governing body is nominated to liaise with the designated officers from the local authority and partner agencies in the event of allegations of abuse made against the Acting Head.

**b) Safeguarding Policies:**

Ensuring that there are effective child protection and staff behaviour policies in place and operating effectively: there is an annual review of the school's Safeguarding and Child Protection policy and procedures, and the efficiency with which the related duties have been discharged.

**c) Appointment of a Designated Safeguarding Lead:**

This is currently the Deputy Head (Pastoral), Jonny Timms, who is afforded the necessary time, training, resources and support to carry out his duties and responsibilities in this aspect of his role.

**d) Providing opportunities to teach safeguarding to pupils:**

Safeguarding and Child Protection education is delivered through PSHE lessons and assemblies.

**e) Inspection Compliance:**

Ensuring compliance with all school inspection requirements.

**f) Safer Recruitment:**

Ensuring that the school endeavours to prevent people who pose a risk of harm from working with children at the school. A deterrent to all such people is in place from the start of the recruitment process, continues through the process to appointment and throughout the employee lifecycle. This is outlined in the school's Safer Recruitment Policy.

**g) Procedures to handle allegations of abuse made against staff or other children:**

Ensuring that the school Safeguarding and Child Protection policy guidance covers how to handle allegations against staff, volunteers and other children.

**h) Meeting the additional requirements for boarding schools with regard to safeguarding:**

Ensuring that the National Minimum Standards for Boarding Schools are met.

The Designated Governor will undertake training in Safer Recruitment and Safeguarding and Child Protection.

### **Guidelines and information for teaching and all other staff:**

- The school issues guidelines to all staff covering;
- The prevention of abuse covering staff supervision of high-risk situations.
- Avoidance of inappropriate physical contact between staff and children.
- Avoidance of inappropriately spending time alone with individual children, for example, in one-to-one tuition, sports coaching, conveying a pupil by car.
- Engaging in inappropriate electronic communication with a pupil.
- The need for all staff to be vigilant in spotting and reporting clear suspicions that abuse may be occurring.

All staff and adults should be alert for significant signs of abuse or neglect of any children. All teaching staff should be aware of the basic procedures to be followed should a situation arise in which a child wished to confide in them. Please read the following carefully:

### **A. The Four Categories of Significant Harm and Signs of Abuse**

Somebody may abuse or neglect a child by inflicting harm, or by knowingly not preventing harm. Children may be abused in a family, the community, an institutional setting, or more rarely by a stranger. Most young people who are abused know their abuser.

Working Together to Safeguard Children sets out definitions and examples of four broad categories of abuse:

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

#### **Some of the following signs may be indicators of physical abuse:**

- Children with frequent injuries;
- Children with unexplained or unusual fractures or broken bones; and
- Children with unexplained bruises or cuts; burns or scalds or bite marks.

#### **2) Emotional abuse:**

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another

person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Some of the following signs may be indicators of emotional abuse:**

- Children who are excessively withdrawn, fearful, or anxious about doing something wrong;
- Parents or carers who withdraw their attention from their child, giving the child the 'cold shoulder';
- Parents or carers blaming their problems on their child; and
- Parents or carers who humiliate their child, for example, by name-calling or making negative comparisons.

**3) 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.

**Some of the following signs may be indicators of sexual abuse:**

- Children who display knowledge or interest in sexual acts inappropriate to their age;
- Children who use sexual language or have sexual knowledge that you wouldn't expect them to have;
- Children who ask others to behave sexually or play sexual games; and
- Children with physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy.

**Child sexual exploitation**

Child sexual exploitation is 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.

**Some of the following signs may be indicators of sexual exploitation:**

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or do not take part in education.

- 4) **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Some of the following signs may be indicators of neglect:**

- Children who are living in a home that is indisputably dirty or unsafe;
- Children who are left hungry or dirty;
- Children who are left without adequate clothing, e.g. not having a winter coat;
- Children who are living in dangerous conditions, i.e. around drugs, alcohol or violence;
- Children who are often angry, aggressive or self-harm;
- Children who fail to receive basic health care; and
- Parents who fail to seek medical treatment when their children are ill or are injured.

**B. Signs of Abuse**

**Definition of Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

**Some of the following signs might be indicators of abuse or neglect:**

- Children whose behaviour changes – they may become aggressive, challenging, disruptive, withdrawn or clingy, or they might have difficulty sleeping or start wetting the bed;
- Children with clothes which are ill-fitting and/or dirty;
- Children with consistently poor hygiene;
- Children who make strong efforts to avoid specific family members or friends, without an obvious reason;
- Children who don't want to change clothes in front of others or participate in physical activities;
- Children who are having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry;
- Children who talk about being left home alone, with inappropriate carers or with strangers;
- Children who reach developmental milestones, such as learning to speak or walk, late, with no medical reason;
- Children who are regularly missing from school or education;
- Children who are reluctant to go home after school;
- Children with poor school attendance and punctuality, or who are consistently late being picked up;
- Parents who are dismissive and non-responsive to practitioners' concerns;
- Parents who collect their children from school when drunk, or under the influence of drugs;
- Children who drink alcohol regularly from an early age;
- Children who are concerned for younger siblings without explaining why;
- Children who talk about running away; and
- Children who shy away from being touched or flinch at sudden movements.

**C. What to do when a child wants to tell you about something that has happened:**

- a. Listen very carefully.
- b. Do not promise confidentiality.
- c. Ask 'open' questions like 'can you tell me what has happened', and avoid any leading questions like 'Did he/she do X to you?'
- d. Make written notes as soon as possible, including anything that you have said.
- e. Do not take it upon yourself to investigate what the child has told you.
- f. Do not tell the person about whom the child has complained.
- g. If you think that, a child is at risk contact the DSL, or DDSL or ADSLs.

**D. How to write a report on what you have been told:**

- a. Note the date, time, the child's name and your name.
- b. Note the 'who/what/where/when' of the allegation.
- c. Note your own opinion if it is relevant, preferably with justification.
- d. Reflect on why you have logged the incident.
- e. Hand the report to the DSL, or DDSL or ADSLs.

**E. Deficiencies**

The Acting Head, staff and all adults should be aware that although this document is on an annual review cycle, interim amendments may occur and any deficiencies immediately rectified. In these circumstances, you will be notified and will be required to read and be familiar with the amended document.

#### **F. Managing allegations against other pupils**

At Caldicott, we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other students. We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's Behaviour Policy.

#### **Safeguarding allegations**

Allegations may be made against students by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found.

#### **The allegation:**

- is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil
- is of a serious nature, possibly including a criminal offence
- raises risk factors for other pupils in the school
- indicates that other pupils may have been affected by this student
- indicates that young people outside the school may be affected by this student

#### **Examples of safeguarding issues against a student could include:**

##### **Physical Abuse**

- violence, particularly pre-planned
- forcing others to use drugs or alcohol

##### **Emotional Abuse**

- blackmail or extortion
- threats and intimidation

##### **Sexual Abuse**

- indecent exposure, indecent touching or serious sexual assaults
- forcing others to watch pornography or take part in sexting

##### **Sexual Exploitation**

- encouraging other children to attend inappropriate parties
- photographing or videoing other children performing indecent acts

Young people suffering from sexual exploitation themselves may be forced to recruit other young people under threat of violence.

### **Minimising the risk of safeguarding concerns towards pupils from other students**

On occasion, some students will present a safeguarding risk to other students. The school should be informed that the young person raises safeguarding concerns, for example, they are coming back into school following a period in custody or they have experienced serious abuse themselves.

These students will need an individual risk management plan to ensure that other pupils are kept safe and they themselves are not laid open to malicious allegations. There is a need to balance the tension between privacy and safeguarding.

### **What to do**

When an allegation is made by a pupil against another student, members of staff should consider whether the complaint raises a safeguarding concern. If there is a safeguarding concern, the normal Safeguarding and Child Protection procedure should be followed.

## **CHILD PROTECTION - CODE OF GOOD PRACTICE**

### **Code of Behaviour – The Do's...**

- Do put this code into practice.
- Do set an example you would wish others to follow.
- Do treat everyone with dignity and respect.
- Do treat all young people equally – show no favouritism.
- Do ensure that if you are in a one-on-one situation with a young person that the door is either open or contains a glass panel and that another adult is aware of your meeting / lesson.
- Do respect a young person's right to personal privacy.
- Do allow young people to talk about any allegations and concerns that they may have and refer immediately.
- Do encourage others to challenge attitudes / behaviours that they do not like.
- Do avoid being drawn into inappropriate attention seeking behaviour e.g. tantrums and crushes.

- Do remember this code even at sensitive moments. E.g. when responding to bullying, bereavement and abuse.
- Do keep other members of staff informed of where you are and what you are doing.
- Do remember that someone else may misinterpret your actions however well intentioned they may be.

**Do take note** that there does need to be an appropriate level of supervision to safeguard young people in changing rooms. However, this supervision must be appropriate to the needs and age of the young people concerned.

**Do ensure** that if you need to have appropriate physical contact with a child that you ask their permission first. e.g. PE / Music / Drama / comforting a distressed child.

**Do remember** any physical restraint is only permissible when a child is in imminent danger of inflicting an injury on himself/herself or on another, and then only as a last resort when all efforts to diffuse the situation have failed.

#### **Dress Code:**

**Do ensure** your appearance is always appropriately professional. Dress, which might be deemed offensive, distracting, revealing or provocative, must be avoided: clothing should be modest. Teachers should wear smart professional clothes in the classroom; PE or sports clothing should only be worn in PE or games lessons.

If you are in doubt about any form of clothing, you should seek advice from the Deputy Heads. You will be required to change your clothing if it is not considered suitable or appropriate by the Acting Head or Deputy Heads.

#### **Use of Mobile Phones and Electronic Devices:**

Staff may not use their phones / personal devices for personal use whilst on duty. Please refer to the school policy on “Images of Pupils for Record Keeping and Promotional Purposes: Photographs, Videos and Electronic Media”.

#### **Code of Behaviour – The Don’ts...**

- Do not trivialise abuse.
- Do not enter any boarding house without the knowledge of the appropriate member of the boarding team.
- Do not let allegations, suspicions or concerns about abuse go unreported.
- Do not permit abusive peer activities e.g. initiation ceremonies, bullying.
- Do not engage in inappropriate behaviour or contact – physical, verbal or sexual.
- Do not play physical contact games with young people.
- Do not make suggestive remarks or threats to a young person even in jest.
- Do not use inappropriate language – face to face, in writing, phoning, email or internet.
- Do not share personal email addresses with pupils or engage in social media.
- Do not arrange meetings out of school or visit a young person’s home without permission from the Acting Head.
- Do not convey a child in a car unless parental/Acting Head’s permission has been given.

- Do not develop sexual relationships with pupils. If you in a position of trust and develop a sexual relationship with a young learner under the age of 18 it may constitute a criminal offence under the Sexual Offences Act.
- Do not rely on your good name to protect you.

## **Establishing Good Practice:**

### **Minimising Vulnerability to Allegations**

#### **Always:**

- work in an open environment. Avoid private or out of sight locations and encourage open communication.
- speak clearly, without whispering, so that students do not need to come close to hear
- avoid spending time alone with individual students away from others
- treat all students, regardless of race, disability, religion or belief, gender, sexual orientation, equally and with respect and dignity.
- ensure the student's welfare comes first and record it.
- be aware of the impact of proxemics; maintain safe and appropriate distances; Know where and how to place your body.
- avoid touching students, but where **educationally necessary** staff should follow these guidelines:
  - try to demonstrate without touching first
  - ask permission; say what you intend to do first and explain why
  - if a pupil seems uncomfortable: stop
  - only touch hands, arms or shoulder nearest you (don't reach across the body)
  - be aware of overall proximity; maintain physical space; don't stand behind
  - inappropriate areas for touch include: chest, diaphragm, waist, thighs
  - move away as soon as the contact is no longer required
- maintain professional boundaries, perhaps using a specific mobile number or email address for work purposes, rather than sharing personal details
- present as an exemplary role model by not smoking or drinking alcohol, swearing, allowing suggestive conversations or jokes or wearing less than professional clothing when in the company of a student
- seek to be enthusiastic and constructive when giving feedback rather than making negative or critical remarks
- record any injury that occurs and seek attention from a qualified First Aider or parent.
- record any incident of concern involving student's welfare.
- 

#### **Never:**

- allow allegations made by a child to go unchallenged, unrecorded or not acted upon (this applies to any form of abuse or bullying);
- lock doors, cover windows or use 'Do Not Disturb' signs;
- impose humiliating or power based punishments on a student or reduce a child to tears;
- engage in rough, physical or sexually provocative games, including horseplay;
- allow or engage in any form of inappropriate touching;
- share a bedroom with a child;
- allow children to use inappropriate language unchallenged;
- make sexually suggestive comments to a young person, even in fun;
- engage in any form of relationship, sexual or otherwise, with a young person you work with even if they are over the age of consent, but under 18 (older with vulnerable adults);
- do things of a personal or intimate nature for children or disabled young people that they can do for themselves;
- invite or allow children to stay with you at your home unsupervised;
- 'friend' a child on their social media or yours; social media can blur boundaries;
- take photographs or videos of children unless written/signed consent has been obtained from a parent/carer; this includes the use of phones.
- seek physical contact. Try to gently discourage contact, rather than reject students. Model appropriate contact, e.g. shaking hands or patting the shoulder. Never allow physical contact when you are alone.
- take a child in your car, but where this is unavoidable:
  - prepare a risk assessment
  - ensure your insurance covers business passengers (NB this may provide a very good reason for not being able to take students in your car.)
  - obtain parental permission, preferably in writing
  - take more than one person
  - sit child in the back
  - travel directly to the destination
  - keep conversation professional

### **Quick Reference – Summary**

#### ***If you suspect abuse, you receive a complaint or allegation.***

If you suspect abuse, a young person confides in you, or a complaint is made about any adult or yourself, it is your duty to report the concern immediately to the DSL, the DDSL or one of the ADSLs.

**If a young person tells you about abuse by someone else or if you have a concern about a young person's safety or well-being:**

1. Allow the young person to speak without interruption, accepting what is said.
2. Offer immediate understanding and reassurance whilst passing no judgement.
3. Advise the young person that you will try to offer support but you must pass the information on.
4. Immediately tell the DSL, DDSL or one of the ADSLs.
5. Write careful notes of what was said / what you witnessed / heard or were told. Please use the "Child Concern Form" as given on pages 21, 22 & 23 of this document.
6. Sign, date and pass your notes onto DSL, DDSL or ADSLs.

**If you receive a complaint or allegation about any adult or yourself:**

1. Immediately tell the DSL, DDSL or ADSLs.
2. Write careful notes of what was said / what you witnessed / heard or were told. Please use CP concern sheet (where possible).
3. Sign, date and pass your notes onto the DSL, DDSL or ADSLs.
4. Try to ensure that no one is placed in a position, which could cause further compromise.

*Note: Any adult at Caldicott school has the right to report any concerns, or suspicions about another member in confidence and free from harassment (see Whistleblowing Policy).*

***You must refer; you must not investigate.***

If you are in any doubt about policy or procedure, please contact:

**Child Welfare and Safeguarding**

**CHILD PROTECTION RECORD – Report of a Concern**

<b>Name of referrer:</b>		<b>Role of referrer:</b>	
<b>Child Name:</b>			
<b>Date of birth:</b>		<b>Year Group / class:</b>	



<p><i>To be completed by DSL/DDSL</i></p> <p><b>Action taken:</b></p>		<p><b>Advice sought:</b> <i>(from whom and what was advice given)</i></p>	
<p><b>Concern / referral discussed with parent /carer?</b></p>		<p><i>If not, state reasons why – if yes, note discussion with parent</i></p>	
<p><b>Referral made:</b></p>		<p><i>If not, state reasons why – if yes, record to whom and any action agreed</i></p>	
<p><b>Feedback to referring member of staff:</b></p>			<p><i>By whom</i></p>
<p><b>Response to / action taken with pupil:</b></p>			<p><i>By whom</i></p>
<p><b>Name and contact number of key workers:</b></p>			
<p><b>Name and contact details of GP:</b></p>			

**Other notes /  
information:**

**Any other action  
required:**

## **APPENDIX 1**

### **POLICY: IMAGES OF PUPILS FOR RECORD KEEPING AND PROMOTIONAL PURPOSES (Photographs, Videos and Electronic Media)**

Updated: January 2017

Review date: January 2018 or as necessary

Responsible Person: Deputy Head Pastoral, Jonny Timms

#### **A. Purpose**

To ensure that the school is operating good practice around the taking and use of images of pupils and is working within the requirements of the Data Protection Act 1998. Under this act, Caldicott must seek parental consent to take photographs and use video recorders to take and use images of pupils.

This policy should be read in conjunction with the E-safety policy.

This policy is for the information, advice and guidance of all staff, parents, governors, volunteers and visitors to the school.

#### **B. Context: the uses of images:**

Children have their photographs taken on school cameras and downloaded onto the school system to provide evidence of their achievements for developmental records (The Early Years Foundation Stage, EYFS 2012). Photographs may be taken during indoor and outdoor play and displayed in albums or a child's development records for children and parent/carers to look through.

We also use anonymous images of pupils for promotional purposes – for example in brochures or on the school website.

#### **C. Practice Guidelines:**

##### **1. Consent**

Parents who accept a place for their child at the school are invited to agree to the school using anonymous photographs and video of their child and information relating to his achievements for promotional purposes, which may be used in school publicity. This forms part of the Parent's Contract.

##### **2. Storage of Images**

- i. Photographs will be stored on the Caldicott computer system, which is password, protected. If the school ceases to operate, all photographs will be shredded or deleted from the Caldicott system.

- ii. Caldicott's digital camera/s or memory cards must not leave the school premises except for use on outings. Photos are printed in the setting by staff and images are then removed from the camera's memory.

### **3. Use of personal mobile devices**

- i. Staff, visitors and volunteers are only permitted to use their own mobile phones in events such as, Sports day, Outings, Christmas and Fundraising Events. This must always be in full view of all attending.
- ii. Staff may only use their phones/personal devices to take photos of school events on the strict understanding that these are downloaded onto the school system (within 24 hours) and deleted off their personal devices.
- iii. Phones / personal devices should only be used if the school camera is not available. Visitors may only use their phones outside the building.
- iv. Staff are not permitted to use either their own mobile phones / personal devices for personal use whilst on duty.
- v. Use of cameras and mobile phones / electronic media are prohibited in the toilets, changing areas and poolside.

### **4. Image sharing**

- i. Only designated staff can share images/video on social media; other parties must seek explicit permission from parents of the children involved.
- ii. Nobody should take or record any images of Caldicott children for their own records.
- iii. Anyone taking photographs should be alert to the fact that often photographs may contain other children in the background and consideration should be given to these children in the context of this policy.

### **5. Additional guidance and information for staff**

- i. In cases of a personal emergency, all personal calls should be directed through the Caldicott office phone.
- ii. Staff are asked not to make personal calls during teaching time. However, in urgent cases, a call may be made or accepted if deemed necessary and by arrangement with the Acting Head.
- iii. Any non-compliance will be taken seriously, logged and investigated appropriately in line with our disciplinary and e-safety policy.

### **6. Reporting on Compliance and Effectiveness**

A report on the application of this policy including numbers of any exceptions resulting in disciplinary action will be available from the Deputy Head Pastoral.

## **APPENDIX 2**

<b>POLICY:</b>	<b>PREVENT</b>
Updated:	January 2017
Review date:	January 2018 or as necessary
Responsible Person:	Deputy Head Pastoral, Jonny Timms
Responsible Governor:	Liz Hungin

Caldicott's Prevent Policy responds to the Government's guidance published in July 2015. Governors and staff are aware of their responsibilities to prevent terrorism, radicalisation and FGM and to know the school's policy in these matters.

The school acknowledges that we all have a duty of education and care both in and out of the classroom, to ensure that pupils grow up to be tolerant and informed individuals who can make reasoned judgements on any situation that may confront them. To this end, our equal opportunities policy, our PSHE and Divinity teaching and our Assemblies and Chapel encourage and reinforce an atmosphere of tolerance and anti-discrimination, while making pupils aware of the many conflicting and sometimes dangerous ideologies into which they might be unwittingly drawn.

### **Risk Assessment**

The school has carefully considered the Prevent Guidance provided by the Government and has consequently deemed the risk to our pupils to be very low.

### **Training**

All Caldicott staff have been made aware of the Prevent duty and know how to identify and manage pupils who might be exhibiting extremist attitudes and activity. This policy document and measures implemented in the PSHE programme will be shared regularly with all staff at Insets.

All teaching and boarding staff at Caldicott will complete an online test on General Awareness of the Prevent Duty ([http://course.ncalt.com/Channel\\_General\\_Awareness/01/index.html](http://course.ncalt.com/Channel_General_Awareness/01/index.html)).

Through PSHE, Divinity, Assemblies, Chapels, e-safety training and our general pastoral care, the school protects the boys in our care from being drawn into radical activity. Regular reinforcement of awareness and information will be given to key staff at Insets.

## **Additional Measures**

Caldicott constantly monitors internet use and reviews the school filtering processes through our network provider and through our network manager, the Head of ICT. The dangers of online websites and social media will also be highlighted through our e-safety programme in PSHE and talks, specifically looking at social media and radicalisation.

Guest speakers to the school are carefully selected and the content of their presentations to pupils and staff discussed with senior staff in advance. Speakers are met and hosted at all times by a senior member of staff and a log of all visitors to the school is kept in the Main Office.

## **Working in Partnership**

Caldicott has an excellent working relationship with the Local Authorities. All staff are aware that anyone may raise any concerns regarding terrorism, radicalisation and FGM issues with the Buckinghamshire Children's Services via one of the school's Designated Safeguarding Leads. Contact details for the Department of Education extremism helpline are:

- Email: [counter.extremism@education.gsi.gov.uk](mailto:counter.extremism@education.gsi.gov.uk)
- Telephone: 020 7340 7264

## **Contacts at the local authority (Buckinghamshire County Council):**

- |  |                                  |
|--|----------------------------------|
| • Education Safeguarding Advisory Service                  | 01296 383912                     |
| • Local Authority Designated Officer (LADO)                | 01296 382070                     |
| • Social Care First Response Team-                         | 0845 4600 001                    |
| • Family Resilience Service Referral Line                  | 0845 4600 300                    |
| • Social Care - Out of Hours                               | 0800 999 7677                    |
| • Thames Valley Police<br>(Child Abuse Investigation Unit) | 999 (in emergency) otherwise 101 |

Local Safeguarding Children Board [www.bucks-lscb.org.uk](http://www.bucks-lscb.org.uk)

## **APPENDIX 3**

<b>POLICY:</b>	<b>WHISTLEBLOWING</b>
<b>Updated:</b>	January 2017
<b>Review date:</b>	January 2018 or as necessary
<b>Responsible Person:</b>	HR Manager, Nancy Wright

### **A. Purpose:**

The school is committed to ensuring that any allegations of malpractice within the organisation are taken seriously. Employees are asked to bring any such allegations to the school's immediate attention. This is in the interests of the school, its pupils, its staff, and the public. This policy sets out the ways in which employees should bring any concerns to the attention of the school, and explains how and in what circumstances to raise concerns outside the school to appropriate external bodies.

This policy takes into account the protection for employees, who bring matters of public interest to the attention of their employees or outside bodies, which is provided by the Public Interest Disclosure Act (PIDA) 1998. This policy also includes protection for employees, which will be provided by the Human Rights Act.

### **B. Definition of Whistleblowing:**

Whistleblowing occurs when an employee or worker provides certain types of information, usually to the employer or a regulator, which has come to their attention through work. The disclosure may be about the alleged wrongful conduct of the employer, or about the conduct of a fellow employee, client, or any third party. The whistleblower is usually not directly, personally affected by the danger or illegality, although they may be. Whistleblowing is therefore 'making a disclosure in the public interest' and occurs when member of staff raises a concern about danger or illegality that affects others.

### **ckground:**

The organisation **Public Concern at Work** has issued a Whistle-blowing Policy Checklist, which has been endorsed by the Nolan Committee and the Audit Commission. The school has adopted its opening paragraphs:

*"Employees will often be the first to see or suspect misconduct, which may be innocent or which may turn out to be a fraud on your organisation, a public danger, or some other serious malpractice. Making sure your employees keep their eyes open, can, and do play their part is a key way to promote, display and ensure good practice.*

*If you successfully involve your employees it should give a clear message to those who attempt it that they won't get away with it. And everyone else will soon see that you are serious about tackling all forms of serious malpractice and abuse."*

We implement whistleblowing arrangements as we recognize that it makes good business sense:

*“A whistle-blowing policy will improve the trust and confidence among employees by creating what one respondent called a “culture of honesty and openness” by encouraging employees to report internally. This was seen as “good for the morale of employees”, giving them confidence to come forward with concerns. Senior managers will be the first to know of any issues that they may need to address. These can be dealt with internally.*

*This also means that the costs of investigating any problems, such as fraud, are reduced as problems can be caught quickly. The management time and resources saved mean that whistle-blowing procedures are a cost-effective early warning system for firms”.*

(Financial Services Authority Whistle-blowing CP101 (2002) (feedback), page 26)

In the context of good governance, the Committee on Standards in Public Life, whose work has helped inform and influence practice on whistle blowing across and beyond the public sector, has observed that:

*“The essence of a whistle-blowing system is that staff should be able to by-pass the direct management line because that may well be the area about which their concerns arise, and that they should be able to go outside the organisation if they feel the overall management is engaged in an improper course.”*

(Committee on Standards in Public Life Third Report (1996), page 48)

We endeavor to follow the Committee’s recommended that good whistle-blowing arrangements are ones that:

- provide examples distinguishing whistle-blowing from grievances;
- give employees the option to raise a whistle-blowing concern outside of line management;
- provide access to an independent helpline offering confidential advice;
- offer employees a right to confidentiality when raising their concern;
- explain when and how a concern may safely be raised outside the organization (e.g. with a regulator);
- and provided that it is a disciplinary matter (a) to victimize a bona fide whistleblower, and (b) for someone to maliciously make a false allegation.

It is important to the leadership team at the school that the Whistle Blowing Policy is accepted and that it is understood by all staff that it is acceptable to raise a whistle blowing concern. This policy is issued to all staff upon joining the school and any updates are issued as appropriate and signed for to acknowledge they have been received, read and understood.

### **C. Scope:**

Employees are asked to raise their concerns in accordance with this policy, about any of the following matters, which they think are or may be taking place within the school:

- a. Fraud
- b. Malpractice (e.g. financial irregularities, corruption, bribery, dishonesty)
- c. Commission of criminal offences
- d. Failure to comply with legal obligations
- e. Miscarriages of justice
- f. Dangers to Health & Safety
- g. Dangers to the environment
- h. Unethical conduct.

This list is not intended to be exhaustive or exclusive. Employees are asked to raise any other concerns which they may have about matters which they believe threaten the interests of the school, its pupils, its staff, or the public. The procedure is not a substitute for the school's grievance procedure, and concerns about an employee's personal employment situation should be raised through the grievance procedure in the normal manner, as detailed in the Schedules to Terms and Conditions of Employment.

**D. Procedure for bringing concerns to the attention of a responsible person:**

**1. Internal process:**

- i. Employees should raise their concerns under this policy internally within the school in the first instance: the Acting Head and Bursar are responsible for investigating such matters, and therefore all concerns should be raised with either one of them. In the event that it is inappropriate for the disclosures to be made to either the Acting Head or the Bursar, concerns can also be taken to the other.
- ii. Concerns may be raised orally or in writing. Where practically possible a meeting will be held with the person investigating the matter who will then carry out a further investigation depending on the nature of the concerns raised by the employee. Full notes and a chronology will be kept by the person to whom the issue has been reported and who is investigating.
- iii. It is recommended that the person whistleblowing keep their own contemporaneous notes and chronology for reference purposes.
- iv. The employee will be informed as far as possible about the outcome of the investigations, subject to the rights of any third parties, which must be respected.
- v. If the employee is not satisfied that their concerns are being dealt with satisfactorily, the employee can then raise the issue with the Chairman of Governors, who may either deal with the matter himself or nominate another Governor to deal with the matter.
- vi. A further investigation will then be carried out and the employee will be informed of the outcome as far as is possible, subject to the rights of any third parties.

**Escalation to External process:**

i. If after exhausting the internal procedures set out above, the employee it remains dissatisfied with the way in which their concerns have been dealt with, the employee is entitled to raise the issue externally. This should be done by taking the concerns to an external regulatory body (for example, external auditors, the Department for Education and Employment, the Health and Safety Executive). The employee should raise the matter with the external body, which is appropriate to the subject matter to the disclosure.

ii. Employees should not raise concerns with external bodies other than official regulatory bodies except in exceptional circumstances where the matter has already been raised with the school and an official external body but not satisfactorily resolved, or the employee has

reasonable grounds for believing that s/he will be penalised for making a disclosure, to the school, or regulatory body, or s/he believes that evidence would be concealed or destroyed or if the failure is of an exceptionally serious nature. In these circumstances, the employee must act reasonably, and in particular should think carefully about the seriousness of the allegations and the identity of the person or body with whom the concerns are going to be raised. For example, it would usually be more appropriate to bring concerns to the attention of the Police, a local M.P. or local councillor rather than to the press.

## **E. Confidentiality**

1. Employees need to be sure that they can raise concerns about matters within the school in confidence and without fear of reprisals. Therefore, all matters raised by employees under this procedure will be treated as strictly confidential. Names of employees making such allegations will not be revealed to those against whom any allegations are being made without that employee's prior consent.
2. The school will also take all reasonable steps to ensure that employees who have raised concerns under this procedure will not be victimised in any way by fellow employees or other members of the school. The school itself will not penalise employees in any way for raising concerns or making allegations in good faith in accordance with this procedure. The Public Interest Disclosure Act 1998 provides employees with specific protection against victimisation by their employers for making disclosures in accordance with the Act.
3. Victimisation or other unfavourable treatment of an employee, pupil or other member of the school because that person has raised concerns under this policy or in order to deter that person from raising such concerns will be treated as a serious disciplinary offence under the school's disciplinary procedure.

## **F. Abuse of this policy:**

As outlined above, employees and other members of the school will be protected by the school against any victimisation as a result of proper use of the procedure laid out in this policy. However, the school will take abuse of this procedure extremely seriously. If an employee abuses this procedure in order to make false or malicious allegations, this will be treated as a serious disciplinary offence under the school's disciplinary procedure, which may result in disciplinary action being taken against the employee up to and including dismissal from employment.

## **G. Further information:**

Further information and advice can be found at:

<http://www.pcaw.co.uk/>

and

[www.gov.uk/whistleblowing](http://www.gov.uk/whistleblowing)

