

Hampshire Collegiate School

# Child Protection (Safeguarding)

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# Child Protection (Safeguarding)

## 1. Policy statement

Hampshire Collegiate School recognises its moral and statutory responsibility to safeguard and promote the welfare, health and safety of all pupils, including boarders and those in our EYFS setting. The school believes that safer children make more successful learners and that all our pupils have equal rights to protection. Thus, the school is committed to ensuring that the application of the Child Protection (Safeguarding) Policy is non discriminatory in line with the school's Equal Opportunities Policy. We are committed to providing appropriate training (currently every two years for designated persons and every three years for the head and all staff) and support for all our staff in matters of Child Protection; we operate safe recruitment procedures (including CRB checks and compliance with Independent School Standards Regulations) and our Heads of Senior and Junior School have completed the Safer Recruitment Training Course.

HCS aims to do all we can to promote the well being of pupils and to ensure that they are protected from harm. As such, all members of the school community (including supply staff, volunteers and members of the Local Governing Body) have a responsibility to:

- provide a safe and welcoming environment where pupils are respected and valued
- establish and maintain an ethos where pupils feel secure and are encouraged to talk and are always listened to.
- ensure that all children know there is an adult at HCS whom they can approach if they are worried or in difficulty.
- look to provide opportunities across the curriculum, including PSHE, which equip pupils with the skills they need to stay safe from harm and to know to whom they should turn for help
- be alert to the signs of abuse and neglect and act on any suspicion or disclosure that may suggest a child is at risk of harm.
- make themselves familiar with and follow the procedures set out to ensure that children receive effective support, protection and justice.

This policy document complies with section 2.2 of DCSF *Safeguarding Children and Safer Recruitment in Education: statutory* guidance and has regard to the DFE "Working Together to Safeguard Children and what to do if you are worried a child is being abused. It also meets the requirements of Standard 3 of the National Minimum Standards for Boarding Schools. This document is also in accordance with the locally agreed inter-agency procedures of the Hampshire CC Local Safeguarding Children Board (LSCB) which can be found in full at: [www3.hants.gov.uk/childservices/childrenandyoungpeople/child-protection](http://www3.hants.gov.uk/childservices/childrenandyoungpeople/child-protection).

## Policy aims

- to support the child's development in ways that will foster security, confidence and independence
- to provide all HCS staff, (full time, part time, teaching, support, regular school visitors, volunteers) with the necessary information to enable them to meet their child protection responsibilities
- to ensure consistent good practice
- to demonstrate to pupils, staff and parents HCS's commitment with regard to child protection (safeguarding)
- to support any pupil in accordance with his or her agreed Child Protection Plan
- to support other HCS policies and procedures relating to the safeguarding and welfare of all pupils and staff at HCS

This policy is applicable to all pupils in our school including our boarders and those in our EYFS setting. It is available to staff, pupils, parents and the wider community on an unrestricted part of the school's website and paper copies are available on request from the school office.

As required by the UCST Board, this document is reviewed by the school's Local Governing Body annually, unless an incident or new legislation or guidance suggests the need for an interim review, and the school undertakes to remedy without delay any deficiencies or weaknesses identified in the child protection arrangements.

The next scheduled policy review date is September 2012.

## Key Personnel and Contacts

### **The Deputy Chief Executive of UCST:** Ms Charlotte Rendle-Short

The Deputy CE has responsibility for Child Protection across UCST schools and holds a strategic leadership role with regard to safeguarding.

Contact details: e mail: [charlotte.rendle-short@church-schools.com](mailto:charlotte.rendle-short@church-schools.com)  
UCST Central Office: 01832 730310

### **The Principal:** Mr Hector MacDonald

Contact details: e mail: [hector.macdonald@church-schools.com](mailto:hector.macdonald@church-schools.com)  
phone number: 01794 527303. Mobile:07799414645

### **HCS Chair of the Local Governing Body:** Mr David D'Arcy-Hughes

Contact details: e mail: [david@darcyhughes.co.uk](mailto:david@darcyhughes.co.uk)  
phone number: 01962 856243 (home). Mobile 07968 427015

### **The nominated Local Governing Body member with oversight of safeguarding issues**

: Mr David D'Arcy-Hughes [interim]

Contact details: e mail: [david@darcyhughes.co.uk](mailto:david@darcyhughes.co.uk)  
phone number: 01962 856243 (home). Mobile 07968 427015

## Child Protection Managers:

### **The designated senior person for child protection in the Senior School:** Mrs Helen Crawford (Head of Senior School)

Contact details: e mail: [helen.crawford@church-schools.com](mailto:helen.crawford@church-schools.com)  
phone number: 01794 527375.

### **The designated senior persons for child protection in the Junior School and Early Years Foundation Stage:** Mrs Teresa Rogers (Vice Principal and Head of Junior School)

Contact details: e mail: [teresa.rogers@church-schools.com](mailto:teresa.rogers@church-schools.com)  
phone number: 01794 527373.

Mr Giles King (Deputy Head of Junior School)

Contact details: e mail: [giles.king@church-schools.com](mailto:giles.king@church-schools.com)  
phone number: 01794 301541 (home); 07866 067624 (mobile)

### **The designated senior person for child protection in the Boarding House:** Mrs Louise Escott (Head of Boarding)

Contact details: e mail: [louise.escott@church-schools.com](mailto:louise.escott@church-schools.com)  
phone number: 01794 527345.

### **The deputy designated person:** Mrs Mandy Bateman (Deputy Head of Senior School)

Contact details: e mail: [mandy.bateman@church-schools.com](mailto:mandy.bateman@church-schools.com)

## **Contact Details of the Local Agency Responsible for Child Protection**

Hampshire CC Local Safeguarding Children Board (LSCB)

(see contact details in Appendix B)

Any member of staff, pupil, parent or carer may report concerns or allegations about abuse at the school directly to Ofsted using the whistleblower hotline on 0300 123 3155 (Monday to Friday from 8.00am to 6.00pm) or via [whistleblowing@ofsted.gov.uk](mailto:whistleblowing@ofsted.gov.uk), or by writing to: WBHL, Ofsted, Royal Exchange Buildings, St Ann's Square, Manchester M2 7LA.

## 2. Terminology

**Safeguarding** and promoting the welfare of children refers to the process of protecting children from abuse or neglect, preventing the impairment of health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and undertaking that role so as to enable those children to have optimum life chances and to enter adulthood successfully.

**Child protection** refers to the processes undertaken to protect children who have been identified as suffering, or being at risk of suffering significant harm.

**Staff** refers to all those working for or on behalf of HCS full time, part time and regular visiting staff, in either a paid or voluntary capacity.

**Child** refers to all young people who have not yet reached their 18th birthday, and all pupils on HCS roll, including those who remain on HCS roll after their 18th birthday.

**Parent** refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

### 3. Roles and responsibilities

#### a. The Child Protection Managers (CPMs)

At HCS the CPMs are the designated senior persons indicated on page 5 of this document.

The CPMs:

- are appropriately trained in child protection and inter-agency working on appointment and updated every two years
- act as a source of support and expertise to the school community
- have an understanding of Hampshire CC Local Safeguarding Children's Board procedures
- keep written records of all concerns, ensuring that such records are stored securely in the relevant Head of School's office, but kept separate from the pupil's general file
- refer allegations of cases of suspected abuse to children's social care or police as appropriate, making contact with a welfare agency within 24 hours (in writing or with written confirmation of a telephoned referral) of a disclosure or suspicion of abuse. In the case of serious harm the Police are informed from the outset
- notify Child Care Services (Hampshire's Children's Social Care) if there is an unexplained absence of more than 2 days of a pupil who is on the Child Protection Register.
- ensure that when a pupil with a child protection plan leaves HCS Senior / Junior/ EYFS school, his or her information is passed to his or her new school and the pupil's social worker is informed
- attend and/or contribute to child protection conferences
- coordinate the Senior or Junior or EYFS, as appropriate, school's contribution to child protection plan
- develop effective links with relevant statutory and voluntary agencies
- ensure that all staff sign to indicate that they have read and understood the school's child protection policy and the UCST Notes of Guidance for Staff-Student Relationships Guidance Letter (see Appendix C of this document)
- ensure that the child protection policy is reviewed by the school's Local Governing Body annually, unless an incident or new legislation or guidance suggests the need for an interim review. The CPM for Senior School has overall responsibility for such review and update. The CPM for Senior School is also responsible for ensuring the Child Protection (Safeguarding) policy is published on an unrestricted part of the school's website and is available to parents and prospective parents on request from the school office.
- liaise with the nominated member of the LGB with oversight of safeguarding issues: Mr David D'Arcy-Hughes [interim] and the Principal: Mr Hector MacDonald, as appropriate
- keep a record of staff attendance at child protection training and follow up absences to ensure all staff are up to date with such training. Note that whilst the responsibility for CP training for all Brookwood catering and cleaning staff lies with Brookwood, it is the responsibility of the CPM for Senior School to monitor this by requesting a copy of such training records from Brookwood on at least an annual basis.
- ensure senior pupils (mentors) with responsibilities over other pupils are briefed on the CP policy, receive a copy of the policy and know the appropriate action to take if they receive any allegations or disclosures of abuse
- ensure the PSHE curriculum and assembly programmes in both the Junior School and the Senior School include teaching to help all students respond positively to the rights of children to be safe and to know how to protect themselves and others.

- ensure teaching in ICT includes training and information about the safe use of the internet and other technologies.
- discuss (in liaison with the Principal) concerns with Hampshire CC LADO when making a decision to make a referral over what appear to be borderline cases.
- deal with allegations or disclosure of abuse by one pupil to another by informing the Principal inform the Principal. The Principal on all such occasions will discuss the content of the allegation with the parents of both pupils and if appropriate Hampshire Children's Services.
- ensure that all staff, including those in the boarding houses, are aware of the policy and procedures contained within HCS's Missing Pupil document.
- ensure, in liaison with the Deputy Bursar, that where a pupil at HCS is educated on another site or in another institution, a written statement will be obtained that states that appropriate child protection and procedures apply to any staff employed at these sites or other institutions.

### **In addition the CPM for EYFS**

- will liaise with the local statutory agencies: Hampshire CC Local Safeguarding Children Board (LSCB).
- will inform Ofsted as soon as reasonably practicable, but at least within 14days, of any allegations of serious harm or abuse by any person living, working, or looking after children at HCS (whether the allegation relates to harm or abuse committed on the premises or elsewhere), or any other abuse which is alleged to have taken place on the premises, and of the action taken in respect of these allegations. (Ofsted :Telephone: 0300 123 3155)

### **b. The Deputy CPM**

- is appropriately trained and, in the absence of any one of the designated persons, carries out those functions necessary to ensure the ongoing safety and protection of all pupils (day and boarding). In the event of the long-term absence of one of the designated person, the deputy will assume all of the functions above.

### **c. The Principal:**

- ensures that the Child Protection (Safeguarding) Policy and procedures are implemented and followed by all HCS staff.
- allocates sufficient time and resources to enable the CPMs and deputy to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings.
- ensures that all HCS staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle-blowing procedures.
- ensures that pupils' safety and welfare is addressed through the curriculum
- keeps records - objective, clear and accurate and based on evidence – of Child Protection (Safeguarding) issues securely archived for 10 years.
- reports to the Independent Safeguarding Authority (ISA) within one months of leaving the school any person (whether employed, contracted, a volunteer or student) whose services are no longer used because s/he is considered unsuitable to work with children. Failure to do so constitutes an offence.

- ensures that 'compromise agreements' are never agreed in connection with Child Protection (Safeguarding) issues.
- liaises and informs Ofsted and/or DfE of incidents as appropriate.

#### **d. The Deputy Bursar:**

- ensures that safe recruitment practices are followed by checking the suitability of staff and others working with our children. All HCS employees have enhanced CRB checks.
- liaises with the UCST Central Office HR function to ensure the Chair of UCST is subject to an enhanced check with the Criminal Records Bureau made by the Secretary of State to confirm his suitability to work with children and that all Local Governing Body Members are subject to an enhanced check with the Criminal Records Bureau to confirm their suitability to work with children.
- ensures, in liaison with the CPMs and other members of staff organising trips or events, that where a pupil at HCS is educated on another site or in another institution, a written statement is obtained that states that appropriate child protection and procedures apply to any staff employed at these sites or other institutions. Evidence of such checks is held by the Deputy Bursar.
- ensures, in liaison with the CPMs and other members of staff organising events, that all staff not directly employed by the school (employees of other organisations), and in contact with our pupils on the school site, have had the necessary and appropriate child protection checks. Evidence of such checks is held by the Deputy Bursar.
- is responsible for ensuring enhanced CRB checks are made on all employees.

#### **e. The Principal's PA:**

- is responsible for maintaining and updating the school's Single Central Record relating to Safer Recruitment and appointments. This is done in accordance with relevant legislation and UCST directives.

#### **f. The designated member of the LGB with oversight for Safeguarding issues**

- ensures that the HCS's Local Governing Body makes an annual review of the School's Child Protection (Safeguarding) Policy and Procedures and also leads an annual review of the efficiency with which all related duties have been discharged. In this review, s/he will, as a minimum, check the following:
  - CPMs for child protection are members of the senior leadership team and have undertaken the required training in inter-agency working, in addition to basic child protection training
  - the school has a Child Protection (Safeguarding) Policy and procedures that are consistent with Hampshire CC LSCB requirements which is published on an unrestricted part of the school's website and available from the school office on request.
  - the school has adequate procedures for dealing with allegations of abuse made against members of staff including allegations made against the Principal
  - that safer recruitment procedures are being followed – including the requirement for appropriate checks
  - the school has a training programme that ensures all staff, including the Principal, receive child protection training on appointment, with refresher training at three-yearly intervals, and the CPMs receive refresher training at two-yearly intervals
  - arrangements are in place to ensure that all temporary staff and volunteers are made aware of HCS's arrangements for child protection.

- arrangements are in place for all new staff, full and part time, and all volunteers to be given CP training as part of their induction process.

## **g. The Head of Boarding**

The Head of Boarding ensures that to comply with the national Minimum Standard for Boarding Standard 3:

- this Child Protection (Safeguarding) policy is published to staff, any adults working (including parents or parents of prospective pupils) in the boarding school and older pupils in positions of responsibility
- Senior Pupils and those with positions of responsibilities in the Boarding House are briefed on appropriate action to take if they receive allegations or disclosures of abuse.
- the policy and procedures for searching for and if necessary reporting any boarder missing from HCS is known by the boarding staff.
- that parents, guardians and /or cares of boarding pupils of are aware of the procedures by which they are able to report concerns of allegations directly to Ofsted (for contact details, see page 5 of this document)

## **4. The role of all HCS staff in Child Protection (Safeguarding)**

To meet and maintain our safeguarding responsibilities towards HCS pupils all members of staff and those who come into contact with our pupils are expected to adhere to the following good practice, which includes:

- treating all HCS pupils with respect.
- setting a good example by conducting themselves appropriately.
- involving HCS pupils in decisions that affect them, primarily through School Council and Boarding Council
- encouraging positive and safe behaviour among pupils
- being a good listener
- making themselves familiar with the school's Child Protection (Safeguarding) Policy and procedures and other documents relating to wider safeguarding issues, for example bullying, and confidentially
- knowing the names of the designated Child Protection Managers at the school and their role.
- being alert to the signs of abuse as detailed in Appendix A of this document.
- reporting any concerns immediately to any of the designated Child Protection Managers (see page 5 of this document).
- consulting with the designated persons if in any doubt as to how to proceed.
- raising concerns about poor or unsafe practice with the designated Child Protection Manager and that such concerns are addressed sensitively and effectively.
- following the advice given in this document in relation to how to handle disclosures.
- read and understand the UCST Guidance for Staff-Student Relationships which provides guidance to staff to ensure that their behaviour and actions do not place pupils or themselves at risk of harm of allegations of harm to a pupils (for example, in one to one tuition, sports coaching, engaging in inappropriate electronic communication with a pupil, etc.). This is issued to all staff at the start of each academic year and is also to be found in Appendix C of this document.
- ensuring that 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. Appropriate evidence of this should always be passed to the Deputy Bursar.

- participating in the organised training in child protection on appointment and updated every three years.
- being alert to changes in pupils' behaviour and recognising that challenging behaviour may be an indicator of abuse.
- asking the pupil's permission before doing anything for them of a physical nature, such as assisting with dressing, physical support during PE or administering first aid.
- maintaining appropriate standards of conversation and interaction with and between pupils and avoiding the use of sexualised or derogatory language.
- being aware that the personal and family circumstances and lifestyles of some pupils lead to an increased risk of abuse.
- understanding that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach.
  - Note: under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a pupil under 18 may be a criminal offence, even if that pupil is over the age of consent.

All staff must be aware of their duty to raise concerns, where they exist, about Child Protection (Safeguarding) and this may include the attitude or actions of colleagues. We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so. If any member of staff is dissatisfied with the way that a CPM has dealt with their concern over the welfare of a pupil they may contact the Principal or the nominated LGB member with oversight for safeguarding issues.

## 5. Child Protection Procedures

There will be occasions when you suspect that a pupil may be at risk, but you have no 'real' evidence. The pupil's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or you may have noticed physical but inconclusive signs. In these circumstances, you should try to give the pupil the opportunity to talk. The signs you have noticed may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill. It is fine to ask the pupil if they are OK or if you can help in any way.

Use the welfare concern form to record these early concerns- they are available in the Junior and Senior Staff rooms.

If the pupil does begin to reveal that s/he is being harmed you should follow the advice in the part (a) below.

**IT IS BETTER TO RAISE CONCERNS WHICH MAY NOT NEED ACTION THAN TO DO NOTHING OR TO DELAY REPORTING.**

### a. If a pupil makes a disclosure about abuse to you

It takes a lot of courage for a pupil 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.

If a pupil talks to you about any risks to their safety or wellbeing you will need to let them know that you must pass the information on – you are not allowed to keep secrets. The point at which you do this is a matter for professional judgement. If you jump in immediately the pupil may think that you do not want to listen, if you leave it till the very end of the conversation, the pupil may feel that you have misled them into revealing more than they would have otherwise.

During your conversation with the pupil:

- allow the pupil to speak freely and lead the discussion, never stop a pupil who is freely recalling significant events and do not press for details by asking questions, e.g. “What did they do next?”
- remain calm and do not over react – the pupil may stop talking if they feel they are upsetting you.
- listen and be supportive - give reassuring nods or words of comfort e.g. *‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’.*
- accept what the pupil says without challenge — reassure them that they are safe, that they are doing the right thing and that you recognise how hard it is for them.
- do not admonish the pupil for not disclosing earlier. Saying *‘I do wish you had told me about this when it started’* or *‘I can’t believe what I’m hearing’* may be your way of being supportive but the pupil may interpret it that they have done something wrong.
- do not be afraid of silences – remember how hard this must be for the pupil.
- never investigative questions – don’t put words in the pupil’s mouth, or ask leading questions such as *‘How many times this has happened?’ ‘Does it happen to siblings too?’*, or *‘What does your mother think about all this?’*
- don’t investigate – but you may use questions such as, *‘Is there anything else you’d like to tell me?’*
- do not offer any physical touch as comfort - it may be anything but comforting to a child who has been abused.
- do not lay blame or criticise either the pupil or the perpetrator.
- do not promise complete confidentiality — although you can explain that they have done the right thing and tell them that you will only be passing this information onto the appropriate person within school in order to keep them and other children safe.
- tell the pupil what will happen next – the pupil may agree to go with you to see the designated person. Otherwise let them know that someone will come to see them before the end of the day.
- report the information immediately to the school’s designated Child Protection Manager (see page 5 of this document).
- do not discuss the matter with anyone else.
- write an account of the conversation immediately afterwards. Label it with the time, date and location of the conversation and of your written account. Name anyone else present, sign it and hand it to the designated senior person as soon as possible.
- seek support if you feel distressed.
- follow up with a designated Child Protection Manager if you are concerned further.

Remember, it is not the responsibility of the school to investigate suspected cases of abuse. It is, however, our responsibility to follow local safeguarding procedures and to recognise that a pupil telling you they have been abused may be the beginning of a legal process, as well as of a process of recovery for the child. Legal action against the perpetrator can be seriously damaged by any suggestion that the child’s account has in any way been influenced by the person they have told.

In all instances, individual members of staff must not themselves take any further action, although if a parent, guardian or other individual volunteers information of relevance to the incident this should be recorded and handed to a designated Child Protection Manager at the school.

**b. If you suspect or become aware of an allegation of child abuse made against another pupil**

you must bring to the attention of a designated Child Protection Manager at HCS (see page 5 of this document). The child protection procedures set out in this document will be followed, even when the abuse is alleged to have come from another pupil or pupils.

Pupils may be harmed by other pupils, children or young people. Indeed, research suggests that up to 30 per cent of child sexual abuse is committed by someone under the age of 18. Staff are aware of the harm caused by bullying and use the school's anti-bullying procedures where necessary. However, on occasions a pupil's behaviour may warrant a response under Child Protection, rather than anti-bullying procedures.

The management of children and young people with sexually harmful behaviour is complex and the Principal and appropriate CPM will work with other relevant agencies to maintain the safety of the whole school community. Young people who display such behaviour may be victims of abuse themselves and the Child Protection procedures will be followed for both victim and perpetrator.

**c. If you suspect or become aware of an allegation of child abuse made against a colleague, volunteer or a CPM**

you must notify the Principal immediately or, in the Principal's absence the Deputy Chief Executive (UCST) and the Chair of the LGB. The Principal on all such occasions will discuss the content of the allegation with Deputy Chief Executive (UCST), the LGB member with oversight of safeguarding issues and, if appropriate, Hampshire CC Children's Services.

Staff who are concerned about the conduct of a colleague towards a pupil are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount. UCST's whistle blowing code enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place. If there is any cause for concern whatsoever it is vital that information is passed to a designated Child Protection Manager immediately. In the event, following statutory investigation, of concerns proving to be unfounded, staff should not reproach themselves for having raised the issue. In cases of this nature it is always better to be safe than sorry.

When an allegation is made against a member of staff, volunteer or CPM, set procedures are followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events can and do happen. A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, HCS accepts that some professionals do pose a serious risk to pupils and it must act on every allegation.

Staff at HCS 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. The school follows the

UCST procedures for managing allegations against staff. The full procedures for dealing with allegations against staff can be found in *Safeguarding Children and Safer Recruitment in Education*. Further information is also contained in UCST's disciplinary procedures.

Suspension of the member of staff, against whom an allegation has been made, will be carefully considered and the Principal will seek the advice of the Deputy Chief Executive (UCST) and LGB member with oversight of safeguarding issues. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.

If any allegation is made against a member of staff who is resident at the school arrangements will be made for alternative accommodation away from pupils pending the investigation.

In the case of serious harm the Police will be informed from the outset.

**d. If you suspect or become aware of an allegation of child abuse made against the Principal**

you, personally, must report this immediately to the Deputy Chief Executive (UCST) and the Chair of the LGB, without notifying the Principal first.

**e. Notifying parents**

Although HCS seeks to discuss any concerns about a pupil with their parents, issues of Child Protection are handled sensitively and the appropriate CPM will make contact with the parent in the event of a concern, suspicion or disclosure.

However, if the CPM, believes that notifying parents could increase the risk to the pupil or exacerbate the problem, then advice is first be sought from children's social care.

**f. Referring pupils to Children's Social Care**

The appropriate CPM is responsible for making a referral to children's social care if it is believed that a pupil is suffering or is at risk of suffering significant harm. The pupil (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

**g. Reporting directly to child protection agencies**

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care, police or the NSPCC if:

- the situation is an emergency and the CPO, their deputy, the Principal, CP Governor and the Chair of Local Governing Body are all unavailable
- they are convinced that a direct report is the only way to ensure the pupil's safety

**h. Confidentiality and sharing information**

All staff at HCS understand that child protection issues warrant a high level of confidentiality, not only out of respect for the pupil and staff involved but also to ensure that evidence is not compromised by being released into the public domain.

Staff should only discuss concerns with a CPM, the Principal or the LGB member with oversight of safeguarding issues (depending on who is the subject of the concern). This person is able to decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Child protection information will be stored and handled in line with Data Protection Act 1998 principles. Information is:

- processed for limited purposes.
- adequate, relevant and not excessive.
- accurate.
- kept no longer than necessary.
- processed in accordance with the data subject's rights.
- kept secure.

Record of concern forms and other written information are stored by the relevant Head of School in a locked facility and any electronic information is password protected and only made available to relevant individuals.

Every effort is made to prevent unauthorised access and sensitive information is not stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store child protection information on portable media, such as a CD or flash drive, these items are also kept in locked storage. Child protection information is stored separately from the pupil's school file and the school file is 'tagged' to indicate that separate information is held.

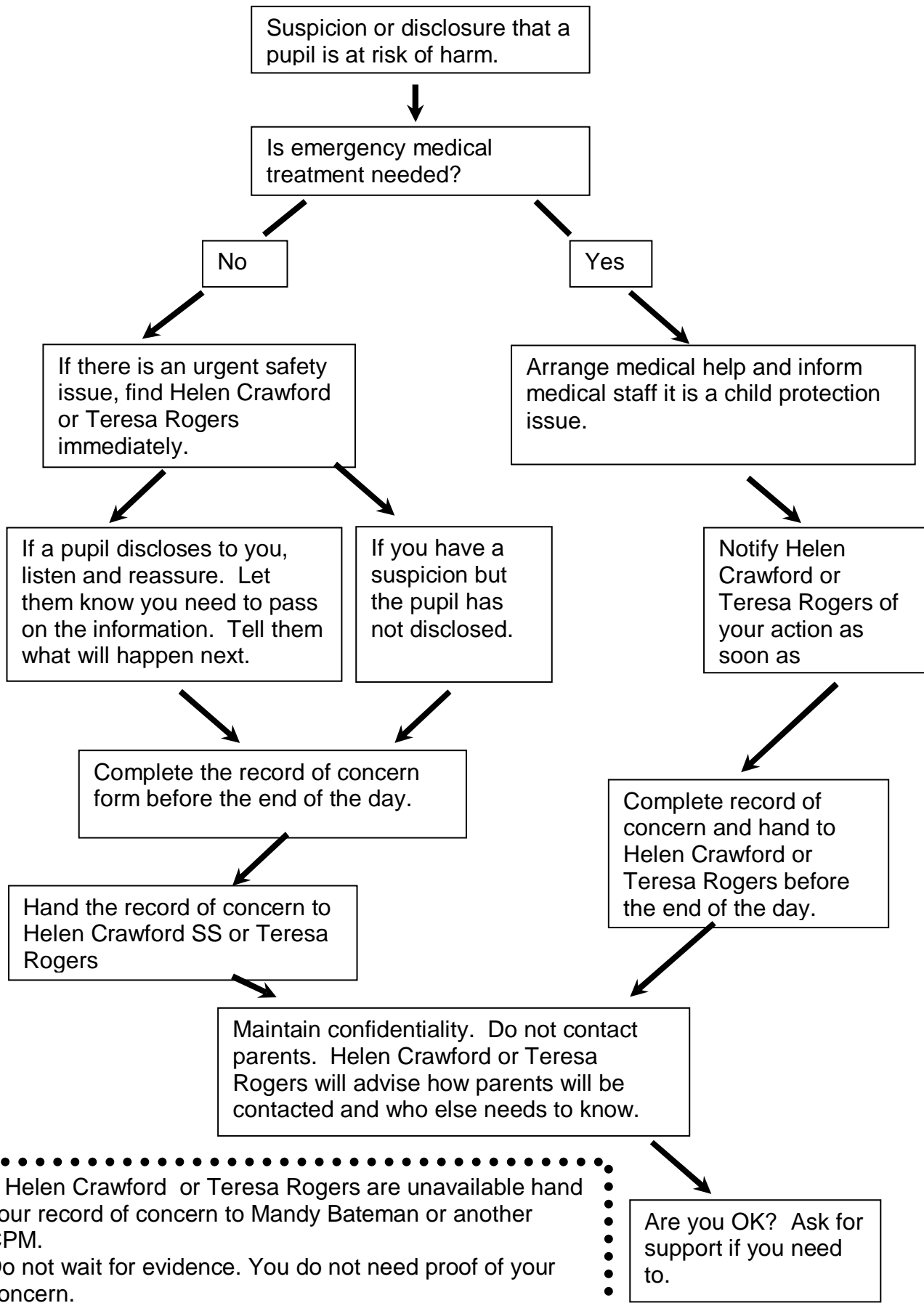
Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that pupils and parents do not have an automatic right to see them. If any member of staff receives a request from a pupil or parent to see child protection records, they should refer the request to the Principal.

The Data Protection Act does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child.

**i. Taking action (key points to remember)**

- in an emergency take the action necessary to help the child, for example, call 999
- report your concern to the appropriate CPM as soon as possible but certainly by the end of the day
- do not start your own investigation
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- complete a record of concern - a flowchart for reporting a concern is on the page below
- seek support for yourself if you are distressed.

**j. Flowchart for reporting a concern**



- If Helen Crawford or Teresa Rogers are unavailable hand your record of concern to Mandy Bateman or another CPM.
- Do not wait for evidence. You do not need proof of your concern.
- Do not try to investigate.

## 6. Support for those involved in a Child Protection issue

Child abuse is devastating for the child and can also result in distress and anxiety for staff who become involved. We will support pupils and their families and staff by:

- taking all suspicions and disclosures seriously. The appropriate CPM keeps all parties informed and is the central point of contact. Where a member of staff is the subject of an allegation made by a pupil or parent, the Principal, to avoid any conflict of interest, is the nominated person who keeps all parties informed and be the central point of contact. Where the Principal is the subject of an allegation made by a pupil, member of staff or parent to avoid any conflict of interest, the designated member of the LGB with oversight of safeguarding issues (Mr David D’Arcy-Hughes [interim]) is tasked with keeping all parties informed and be the central point of contact.
- responding sympathetically to any request from pupils or staff for time out to deal with distress or anxiety.
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies.
- storing records securely.
- offering details of helplines, counselling or other avenues of external support.
- following the procedures laid down in UCST’s whistleblowing, complaints and disciplinary procedures
- cooperating fully with relevant statutory agencies.

## 7. Staff Training

It is important that all staff at HCS have training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern. New staff and LGB members will receive training during their induction. All staff, including the Principal, will receive training that is updated at least every three years and the CPMs will receive training updated at least every two years, including training in inter-agency procedures. Supply staff, other visiting staff will be given the school’s Visiting Staff Leaflet which contains Child Protection (Safeguarding) information. All staff (part time and voluntary), on appointment, will receive training from the CPM as part of their induction programme, and all will receive paper copies of this policy.

Dates for next training:

<b>Child Protection Manager</b>	Helen Crawford	June 2012
<b>Child Protection Manager (Junior School and EYFS)</b>	Teresa Rogers	July 2012
<b>LGB Member</b>	Mr David D’Arcy-Hughes	July 2012
<b>Deputy Child Protection Manager</b>	Mandy Bateman	September 2012
<b>Head of Boarding</b>	Louise Escott	September 2013
<b>All other staff (Support, Peripatetic, volunteers, and Principal)</b>		September / October 2013 (INSET Autumn term)

## 8. Complaints Procedure

HCS complaints procedure will be followed where a pupil or parent raises a concern about poor practice towards a pupil that initially does not reach the threshold for child protection action. Poor practice examples include unfairly singling out a pupil, using sarcasm or humiliation as a form of

control, bullying or belittling a pupil or discriminating against them in some way. An explanation of the complaints procedure is included in the Information Booklet for Parents, is available on the website and from the school office on request. Complaints from staff are dealt with under UCST's complaints and disciplinary and grievance procedures.

## **9. Safer Recruitment**

HCS is committed to doing its utmost to employ 'safe' staff by complying with Independent School Standards Regulations (including CRB checks), following the guidance in Safeguarding Children and Safer Recruitment in Education (pp20-54), and implementing UCST's procedures. Our Heads of Senior and Junior School have completed the Safer Recruitment Training Course

Safer recruitment means that all applicants are required to:

- complete an application form.
- provide two referees, including at least one who can comment on the applicant's suitability to work with children.
- provide evidence of identity and qualifications.
- be checked through the Criminal Records Bureau as appropriate to their role
- be interviewed.
- provide evidence for right to work in the United Kingdom.
- provide evidence on medical fitness (mental and physical).

New members of staff undergo an induction that includes familiarisation with the school's Child Protection (Safeguarding) policy and identification of their child protection training needs. All staff are, on appointment and annually, also required to complete the UCST *Confirmation of Receipt of the Staff-Student Relationship letter and Annual Renewal of CRB and Medical Fitness Status* form.

HCS undertakes to obtain written evidence that states that appropriate child protection and procedures apply to any staff employed at any site or in any institution where a pupil at HCS is educated. Evidence of such checks is held by the Deputy Bursar (Mrs Lynette Rademaker), who liaises with members of staff organising trips or events and, where appropriate, the CPMs. If other organisations provide services or activities on the HCS site the Deputy Bursar is responsible for checking that they have appropriate procedures in place, including safer recruitment procedures.

## **10. Photography and Images**

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place. To protect pupils we:

- seek their consent for photographs to be taken or published. Image consent forms are circulated in the Parents' Information Booklet.
- seek parental consent
- use only the pupil's first name with an image
- ensure pupils are appropriately dressed
  - encourage pupils to tell us if they are worried about any photographs that are taken of them.

## **12. E-Safety**

Most of our pupils will use mobile phones and computers at some time. They are a source of fun, entertainment, communication and education. However, we know that some men, women and young people will use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails, to enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings. The school's e-safety policy explains how we try to keep pupils safe in school. Cyber-bullying by pupils, via texts and emails, is treated as seriously as any other type of bullying and is managed through our anti-bullying procedures.

Chatrooms and social networking sites are the more obvious sources of inappropriate and harmful behaviour and pupils are not allowed to access these sites in school. Some pupils will undoubtedly be 'chatting' on mobiles or social networking sites at home and we have produced a short factsheet to help parents and pupils understand the possible risks. This information and our e-Safety policy is in the Parents' Information Booklet.

***Review Date: October 2012***

## **Appendix A: Recognising Abuse and Children at Risk**

To ensure that our pupils are protected from harm, we all those who come into contact with our pupils need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone, or leaving knives or matches within reach of an unattended toddler.

There are four key categories of abuse\*: physical abuse, emotional abuse, sexual abuse and neglect.

### **Physical abuse**

Physical abuse 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 (this used to be called Munchausen's Syndrome by Proxy, but is now more usually referred to as fabricated or induced illness).

### **Emotional abuse**

Emotional abuse is 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 children that they are worthless or unloved, inadequate or valued only for meeting the needs of another person. It may feature age – or developmentally-inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as 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, 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.

### **Sexual abuse**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (for example, rape, buggery or oral sex) or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

### **Neglect**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance misuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food and clothing or shelter, including exclusion from home or abandonment; failing to protect a child from physical and emotional harm or danger; failure to ensure adequate supervision, including the use of inadequate care-takers; or the failure

to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

\*Definitions taken from *Working Together to Safeguard Children* (2006).

### **Bullying**

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress.

All incidences of bullying should be reported and will be managed in accordance with our anti-bullying policy and procedures. All pupils and parents receive a copy of the anti-bullying procedures on joining the school, it is available on the website and in the Parents' Information Booklet, and the subject of bullying is addressed at regular intervals in the personal, social and health education (PSHE) curriculum. If the bullying is particularly serious, or the anti-bullying procedures are deemed to be ineffective, the Principal and the appropriate CPM will consider implementing child protection procedures.

### **Indicators of abuse – what you might see**

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated person.

Remember, it is your responsibility to report your concerns. It is not your responsibility to investigate or decide whether a child has been abused.

A child who is being abused or neglected may:

- have bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless with regard to their own or other's safety
- self-harm
- frequently miss school or arrive late
- show signs of not wanting to go home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become disinterested in their school work
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the appropriate CPM to decide how to proceed. It is very important that you report your concerns – you do not need ‘absolute proof’ that the child is at risk.

### **Impact of abuse**

The impact of child abuse should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach, and the rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

### **Children who may be particularly vulnerable and at risk of abuse**

Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and a reluctance on the part of some adults to accept that abuse can occur.

To ensure that all of our pupils receive equal protection, we give special consideration to pupils who are:

- disabled or have special educational needs
- living in a domestic abuse situation
- affected by parental substance misuse
- asylum seekers
- living away from home
- vulnerable to being bullied, or engaging in bullying
- living in temporary accommodation
- living transient lifestyles
- living in chaotic and unsupportive home situations
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality
- involved directly or indirectly in prostitution or child trafficking
- are not fluent in the English language

Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats.

**Note:** HCS considers forced marriage to be abuse and deals with such incidents through this Child Protection (Safeguarding) Policy

## Appendix B: Essential Contacts for Hampshire Child Protection

Hampshire Children's Service : 0845 603 5620

[Childrens.services@hants.gov.uk](mailto:Childrens.services@hants.gov.uk)

Hampshire Child Assessment Team 02380 833336

Hampshire Out of hours duty team : 0845 600 4555

Hampshire Emergency Duty Service 02380 233344 (or via Police 084504545445)

Hampshire LADO : Hampshire CC Designated Officer: Mrs Barbara Piddington: 01962 876255

Policies and Procedural requirements of Hampshire, I.of W., Portsmouth and Southampton can be found at [www.4lscb.org](http://www.4lscb.org)

Local Area Safeguarding Boards:

Hampshire: 01962 876230

Southampton: 02380 833803

Isle of Wight: 01983 525790

Portsmouth: 02380 688646

Children's social care: Winchester and Andover: 01264 287400. Eastleigh 023 8061 8722

Out of hours: Social Services Direct : 0845 600 4555

CAMHS: Southampton: 02380 915343

NSPCC helpline: 0808 800 5000      [www.nspcc.org.uk](http://www.nspcc.org.uk)

Childline: 0800 1111

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

New Forest Social Services:

West Shore House

West Street

Hythe

SO41 9YB

023 8084 6953 / 023 8087 7704

Eastleigh and Romsey Social Services:

Russell House

26/28 Romsey Road

Eastleigh  
SO50 9AN

Winchester and Andover Social Services  
Chantry House  
Chantry Way  
Andover  
SP10 1LY

01264 287400

Winchester Rape and Sexual Abuse Counselling: 01962 848018

Connexions Winchester 01962 876279

Education Welfare Service Winchester 01962 869611

Hampshire Adult Services: 0845 603 5630

The Independent Safeguarding Authority  
PO Box 181,  
Darlington  
DLI 9FA  
Telephone: 03001231111

Children's Safeguarding Operations Unit (List 99)  
Mowden Hall  
Staindrop Road  
Darlington  
DL3 9BG  
Telephone: 01325 391302

Ofsted  
Royal Exchange Buildings  
St Ann's Square  
Manchester  
M2 7LA.

Telephone: 0300 123 3155

## **Appendix C: UCST Notes of Guidance for Staff-Student Relationships (2010)**

This guidance is not exhaustive and is designed to set out principles rather than to give detailed and specific advice. Clearly, the circumstances in which staff work vary (e.g. working with very young children, boarding staff, sports staff, etc.); this guidance is meant to give general principles only. Although this advice applies primarily to teachers and to other adults with educational roles, all adults working within schools relate to students/pupils during the course of their duties; again, the general principles apply equally to all who are involved in the school.

- 1** The relationship between staff and students/pupils is a professional one. It is fully expected – and, indeed, hoped – that staff in the school have a friendly and caring relationship with students/pupils; nevertheless, the basis of that relationship is professional not personal. It is suggested that a good test to apply is to reflect on whether the child's parents would be happy with the relationship if they were standing with you.
- 2** A personal relationship between staff and a student/pupil is inappropriate unless it is with the full knowledge and consent of the student's/pupil's parents or guardians. Circumstances in which such a personal relationship may arise might be when your own children are friends with those in the school or when you have a personal relationship with parents of children in the school. It is not normally appropriate for a member of staff to meet with a student/pupil out of school hours or off school premises except with the prior knowledge and consent of parents and the school.
- 3** In general, unnecessary physical contact with students/pupils must be avoided. In some circumstances, physical contact between a member of staff and a student/pupil is necessary and beneficial; it might be, for example, that a Reception teacher might need to pick up a 5 year old who has fallen over in the playground, a sports coach may need to demonstrate to a student/pupil how to hold a racket or a secondary teacher may give a student/pupil a gentle pat on the back as encouragement. In rare circumstances it may be appropriate for members of staff to use reasonable restraint in circumstances where a student is behaving in a manner which endangers him or herself or other people. In these situations, staff are advised to be very sensitive to the student's/pupil's likely reaction and to watch out for signs that the student/pupil is apprehensive or uncomfortable. We all have our own personal space that needs to be protected. Wherever possible when working with students/pupils, other people (adults, colleagues or students/pupils) should be present or the door should be open.
- 4** Over-familiar words and actions, displays of affection, discussion of one's personal life or the personal life of the student/pupil are almost always inappropriate. Sexual innuendo is wrong in all circumstances. Staff must avoid actions, words or expressions that could be interpreted as suggesting that they have an emotional relationship with any student/pupil. In the professional staff-student/pupil relationship it is not appropriate to single a student/pupil out for favours or to suggest to a student/pupil that he or she is a special friend.
- 5** Occasionally it is necessary for professional academic reasons for staff to communicate with students/pupils out of school. Except where absolutely necessary, personal email addresses, home or mobile phone numbers must not be given, asked for or used. A staff mobile phone number might be given to students/pupils for use during an educational visit;

where possible, the school's mobile phone (if there is one) should be used for this purpose. Pastoral matters should not normally be dealt with by personal email or using personal phone contacts. Only in the most exceptional circumstances, for instance, where there is well-founded concern for the unexplained whereabouts of a student, should pastoral matters be dealt with by personal email or using personal phone contact. In any event, records of all contacts must be kept on the student file so that if it is necessary to use email or personal contact, the reason why will be specified in the written record. It is very difficult to envisage circumstances under which individual texting is appropriate except through official school channels.

- 6 It is not normally appropriate for students/pupils to visit a member of staff in their own home. Such a visit might be more likely within a boarding context where staff live on site and so might invite a group of students/pupils – say, a tutorial group – to their house for a meeting or for a celebration. Where such a visit does take place it must be with the full knowledge and consent of either the School or parents or guardians. If possible, more than one adult should be present on such an occasion.
- 7 With older students/pupils, a gathering might be held as part of a celebration. Generally, it is advisable if that is held in school. It is essential that professional criteria (e.g. all the students/pupils in a particular teaching or tutorial group) rather than personal criteria (e.g. selected students/pupils only) are used for inviting students/pupils, that the event is held openly, and that senior colleagues are aware of it. Staff on such an occasion have a particular duty to ensure that the supply and consumption of alcohol is appropriate, is responsible and falls within the law and the school's guidelines on alcohol. As a rule, staff should not consume alcohol whilst in the company of children. This includes educational visits and celebratory functions. There will be occasional situations where alcohol is served either at a meal or school function and in these instances should be approved by the Head/Principal in advance.
- 8 Members of staff who in the course of their professional duties need to work on a one-to-one basis with a student/pupil (e.g. a piano lesson, a maths tutorial, etc.), in particular one of the opposite sex, must take care to ensure that the circumstances of the meeting or lesson are always entirely professional. Staff are advised to use a room which has vision panels in the door or keep the door open and ensure that colleagues know that the meeting or lesson is taking place. It is helpful if the meeting or lesson can be arranged during normal school hours or immediately before or after school when there are plenty of other people about.
- 9 Staff must avoid threatening words, raised voices and any aggressive contact such as holding, pushing, pulling or hitting, which could amount to or which could be interpreted as a criminal assault.
- 10 Members of staff do have the right to use reasonable physical force to restrain students/pupils in order to prevent them from committing a criminal offence, injuring others or themselves, damaging property or behaving in such a way as to compromise good order and discipline. The revised guidance document which replaces DfES Circular 10/98 "[The Use of Force to Control or Restrain Pupils](#)" sets out more detailed advice simply and clearly.
- 11 Social networking sites, such as Facebook, Twitter, Bebo and Myspace, pose risks for all staff in terms of professional integrity and the welfare of pupils. Staff must not use these sites

to contact or communicate with pupils or pupils who have recently left. Unfortunately some pupils post information on their social networking sites which is inappropriate in language or visuals. To view such pages may alter your judgement of pupils, to be known to be viewing them may alter a pupil's view of you, and to comment to pupils about what you have seen is likely to have an impact on your professional reputation as well as possibly causing distress to pupils concerned. Should you become aware of material about yourself, the school, or a pupil which is inappropriate, the Senior Leadership Team must be informed and they will instruct a member of staff to check the allegations and inform the appropriate authorities. You must not check it out yourself.

- 12 If you are at all concerned about anything which has occurred or which has made you uncomfortable, you must discuss the matter with a senior colleague at the earliest opportunity even if it turns out that nothing untoward has happened. You must make a written record, dated and signed, of any such incident.
- 13 Where any allegation of abuse is made against a teacher, other member of staff or volunteer, the Group is committed to dealing with the allegation fairly, quickly and consistently, in a way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.
- 14 Staff will also find information relevant to staff-student relationships in the policies and procedures in their school or academy which cover the following:
  - (a) Safeguarding (Child Protection);
  - (b) Behaviour and Discipline;
  - (c) Physical Restraint;
  - (d) Email and Internet Acceptable Use Policy.

\*\*\*\*\*

To all staff:

Every one of us working within schools and academies, whatever our role, is acutely aware that issues to do with the protection of children are of the highest possible importance. Trust underpins everything that we do in schools. The parents of our pupils entrust the care of their children to us and together we are all responsible for their well being. UCST and ULT also have a responsibility to ensure that those working in our schools and academies are themselves protected - against putting themselves in a vulnerable position and against the possibility of false accusation.

This letter has also been prompted by the isolated actions of a tiny handful of employees who have found themselves – or who have put themselves – in a vulnerable position. These instances have all led to disciplinary action including in the most serious cases dismissal for gross misconduct. The UCST and ULT Boards have asked me to write to every person employed directly by UCST and by ULT or working in our schools and academies to remind us all just how serious these matters are but also to offer some advice as to how to respond in potentially difficult situations.

Heads and Principals will discuss this issue with their staff at appropriate times during the school year. This letter reinforces those statements and ensures that no single person, either employed by or working within schools or academies belonging to or associated with UCST or ULT, is in any doubt that child abuse is an issue that must be treated with the utmost seriousness. Acts of child

abuse may be blatant and incontrovertible. However, it must be understood that touching, physical contact, personal emails/text messages or contact through social and personal networking websites are almost always inappropriate within the professional context of schools and can easily be construed as child abuse in some circumstances.

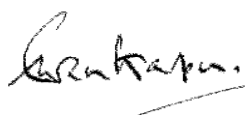
Against this background, UCST and ULT have to ensure that no situation could arise involving any of us which is or could reasonably be construed as acting against the safety of each child. We all understand that it is not always an easy line to draw but crossing that line, or being in a position where it appears that the line has been crossed, is unacceptable. Some adults within the school undertake roles where the drawing of that line is even more important because of the ease with which the proper execution of their duties might be misinterpreted or because the vulnerability of the young people in their care might be more easily exploited. These might include those:

- working in boarding houses or residential situations, including, for example, school trips and excursions;
- whose work requires them to interact in a one to one situation, particularly when that work takes place behind closed doors as is often the case with peripatetic music lessons;
- whose work by its nature requires some physical contact with children, for example, those working with very young children and those involved in the coaching of sport or other practical subject where a correct technique may need to be demonstrated;
- who have high levels of access to ICT systems and, indeed, all who use the internet, email, text messaging and other forms of electronic communication;
- young employees and workers whose duties require them to work with older pupils (e.g. sixth formers) where the age differential is quite small.

Within each school and academy, Heads and Principals will issue both verbal and written guidance from time to time and will make available appropriate training to help everyone deal with this difficult issue. A statement of guidance follows this letter.

Finally, having said all this, it is still important for all of us to retain an appropriate balance. The UCST and ULT Boards greatly appreciate the devotion and commitment of those who work in our schools and academies. Our work in education is most effective when we respect and care for children, when we enjoy their company and when we celebrate their achievements. The trust placed in us as we guide these young people through their formative years is huge. We all need to help each other shoulder this responsibility to the very best of our ability.

Yours sincerely



Sir Ewan Harper  
Chief Executive

## Appendix D: Whistleblowing Code

HCS adheres to UCST's whistleblowing policy and procedures that enable staff to raise concerns relating to:

- crime
- a miscarriage of justice
- illegality
- health and safety
- environmental or property damage
- unauthorised use of public funds
- concealing or attempting to cover up any of the above.

This code provides additional information to help staff to understand the role of whistleblowing in the context of poor practice and unacceptable conduct and attitudes towards children.

### When to use the code

The whistle blowing procedures and this code may be used by anyone employed at HCS in a paid or voluntary capacity who believes they have reason to suspect that the conduct of an employee towards a pupil is inappropriate.

Inappropriate conduct includes, but is not confined to:

- bullying or humiliation
- contravening health and safety guidelines
- serious breaches of the school's code of ethical practice
- professional practice that falls short of normally accepted standards
- compromising pupils' welfare but in a way that does not meet the threshold for child protection intervention.

### Reasons for blowing the whistle

Staff will naturally be reticent to report a concern about the conduct of a colleague. However, each individual must take responsibility for ensuring that pupils are fairly treated. If poor practice is allowed to continue unchecked, it could escalate with serious consequences.

Your action not only protects pupils, but also deters any suggestion that you have colluded with poor practice that you knew was occurring but chose to ignore.

Whistleblowing can also support the member of staff who is the subject of the concern. Their conduct may result from inexperience or lack of training that can be addressed by the school, or they may be under stress and be relieved when their conduct is questioned.

Staff who deliberately fail pupils and show no remorse or desire to improve are unlikely to welcome being exposed, but their conduct has to be confronted for the sake of the pupils and the reputation of the whole school.

### Barriers to whistle blowing

You may worry that you have insufficient evidence to raise a concern, that you will set in train an unstoppable chain of events, that there will be adverse repercussions for your career, that you may suffer harassment or victimisation, or that your suspicion or concern might be totally misplaced.

These concerns are entirely understandable but you can be reassured that whistleblowing procedures address these issues.

The Public Interest Disclosure Act 1998 protects employees from reprisals for public interest whistleblowing. Your union, a solicitor or the local authority legal services can provide you with information about your legal position.

### Confidentiality and anonymity

All concerns are treated in confidence and, as far as possible, your identity will not be revealed if that is your wish. However, absolute confidentiality cannot be guaranteed if, as a result of an investigation, you are required to provide a witness statement or attend a court hearing.

You can, if you prefer, raise your concern anonymously. The Principal and the Chair of the Local Governing Council would need to decide whether the levity and credibility of the concern warrants investigation if the source of the concern, and the key evidence, is not readily available.

UCST, the Principal and the Local Governing Body will fully support you and do all it can to protect you from any harassment or adverse repercussions that may arise from whistleblowing.

Allegations that prove to be deliberately fabricated and malicious will be dealt with through UCST disciplinary procedures. However, no action will be taken against any member of staff who raises a genuine concern that proves to be unfounded.

### Reporting procedure

It may help if you write down, for your own benefit, what you have observed or heard that is causing alarm. One useful way to decide whether your concern should be reported, is to consider whether you would want the conduct of this member of staff to continue unchecked if your own child or another young family member was involved.

You may raise your concern verbally or in writing. You should report your concern directly to the Principal.

If the Principal is the subject of your concern, speak to the Chair of the Local Governing Body.

A friend, colleague or union representative may accompany you to the meeting if you wish.

Ensure the Principal or Chair informs you of their proposed action and sets a date for a second meeting.

Timescales will depend on the complexity of the initial inquiry but the case should not be allowed to stall and you should receive initial feedback within 10 working days. The timescale for subsequent feedback should then be agreed.

Ask for clarification about confidentiality and ensure you have your wishes regarding the protection of your identity recorded.

### Process and outcome

The Principal or Chair will make enquiries to establish the facts of the matter and whether poor practice or inappropriate conduct has occurred.

Members of the school community, including members of the Local Governing Body, may be asked to provide information or advice.

External advice, for example, from legal or human resources or children's services may be sought.

A written record of the conduct, established facts and outcome of the inquiry will be kept.

The whistleblower will be kept informed of the progress of the inquiry.

The outcome of the inquiry will be one of the following:

No poor practice or wrongdoing is established and the case is closed

The concern has some substance and the subject of the concern will receive advice and support from the Principal to improve practice

Poor practice or wrongdoing is established and disciplinary proceedings are initiated

The concern is more serious and an investigation is initiated. This investigation may involve the local authority's legal team, children's social care or the police.

If, at any stage in the process, there is reason to believe that a child is at risk of significant harm, children's social care will be immediately involved.

#### Further action

If you raise a concern and you are dissatisfied with the way it is managed, or the outcome, you may contact the Deputy CEO at UCST for advice.

Alternatively you can seek advice from your union or professional association, a solicitor, the police, children's social care or Public Concern at Work (PCaW), a registered charity that offers free and confidential legal advice on workplace malpractice.

#### Public Concern at Work

Suite 301, 16 Baldwins Gardens, London , EC1N 7RJ

020 7404 6609 - [whistle@pcaw.co.uk](mailto:whistle@pcaw.co.uk) - [www.pcaw.co.uk](http://www.pcaw.co.uk)

