

## SAFEGUARDING (CHILD PROTECTION) POLICY

This policy is applicable to all pupils, including those in the EYFS.

### Statement

The welfare of our pupils is the school's paramount concern. At St Hugh's, the governors, staff and volunteers do all that we can to promote the welfare of pupils and to ensure that children are protected from harm both within the School and beyond our direct control. The School recognises that we have a duty to protect children at risk of harm and also those children who need extra help, including children in the Early Years Foundation Setting (EYFS). We recognise our legal duty to work with other agencies in protecting children from harm and responding to allegations of abuse.

### Aim

To ensure that the correct procedures are in place to enable Safeguarding issues to be dealt with effectively, efficiently and sensitively. To ensure that we practise safe recruitment by checking the suitability of staff and volunteers working with children. To establish a safe environment in which children can learn and develop.

### Procedures

- Safeguarding is recognised as a critically important issue by the School.
- Guidance on the best way to react and deal with such issues is regularly updated and published as 'Safeguarding (Child Protection) Guidance'
- The School offers pupils a range of people to whom they may go to discuss problems, these include outside agencies. These people may be: any member of staff, form teachers, Senior Tutors, tutors, house parents, the independent listener, the Children's Commissioner. Furthermore, the school also offers opportunities to be heard via the School Council, house meetings, boarding meetings, tutor meetings, etc. A list of names and contacts is made available to children.
- The School has a complaints procedure through which students, parents and staff can exercise their right to complain about issues which are worrying them in school.
- The School takes precautions to prevent the possibility of false allegations being made.
- Safeguarding related issues are taught as appropriate through the curriculum.
- The School seeks to promote positive, working relationships with other agencies involved in protecting children from harm and responding to abuse.
- The School also follows procedures set out by the Oxfordshire Safeguarding Children Board.
- Appropriate INSET will be provided for staff to ensure that they are up-to-date with Safeguarding issues and procedures.
- The DSL and Deputy DSL s have job descriptions setting out their key responsibilities. The School will ensure the DSL and Deputy DSL have sufficient time, funding, supervision and support to fulfil their welfare roles. Regular reviews of their responsibilities will take place.

**This policy must be read in conjunction with the Safeguarding Guidance published and reviewed annually by the Headmaster and Board of Governors.**

**Latest Update: 4 July 2018**

Reviewed by Board of Governors: 16 June 2018

Next Review by Board of Governors: 15 June 2019

## SAFEGUARDING (CHILD PROTECTION) GUIDANCE

This policy is applicable to all pupils, including those in the EYFS.

The Designated Safeguarding Lead (DSL) with overall responsibility is the **Nick Armitage** (Deputy Head) and the Deputy DSL is **Richard Clarke** (Assistant Head (Pastoral)). Both the DSLs are members of the SLT (Senior Leadership Team). **Andrew Nott** (Headmaster) is also a DSL. **Anna Coull** is the Board of Governors' designated Child Protection/Safeguarding governor.

The DSL or Deputy DSL will always be available to discuss safety concerns.

### Important Background

- This policy pays due regard to:
  - *Children Act (1989)*
  - *'Keeping Children Safe in Education' (September 2018)*
  - *'Working Together to Safeguard Children' (2015)*
  - *Disqualification under the Childcare Act 2006 (By Association)*
  - *'Prevent' Counter-Terrorism and Security Act (2015)*
- A copy of this policy is made available to parents on the school's website and a copy is sent to those who request it. All staff who have experience in safeguarding are invited to contribute to the drafting of this policy.
- The school operates safe recruitment procedures (Recruitment Policy) in accordance with the Independent School Standards Regulations (ISSRs).
- The school seeks assurance that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the school's pupils on other sites (eg. residential trips).
- The whole Senior Leadership Team (SLT), Head of HR Officer and Director of Music have undertaken Safer Recruitment training.
- The DSL and Deputy DSL receive appropriate training (from Oxfordshire Safeguarding Children Board) in Child Protection and Inter-Agency working every two years, as do the Headmaster, Head of Boarding, Senior Tutors and Head of Middle School
- All teaching, non-teaching staff and Headmaster receive Child Protection training (from Oxfordshire Safeguarding Children Board) every three years. This training regime is agreed with the OSCB.
- This formal training is supplemented by regular informal updates provided to staff via meetings and through email bulletins.
- Staff, children and parents receive training in online safety through the services of Child-Net.
- Induction training in Child Protection is arranged for all new staff and volunteers.
- The Board of Governors undertakes an annual review of the school's Safeguarding Policy and procedures and the efficiency with which they have been discharged at its Board meeting every November.
- Following the annual review of Safeguarding by the Board of Governors, an annual Safeguarding Report is sent to the local authority each year.
- The Board of Governors receives annual training updates on Safeguarding from the DSL.
- Any weaknesses or deficiencies in Child Protection matters will be rectified without delay.

- The Head of Pre-Prep will take the lead responsibility for safeguarding children within the EYFS setting and liaising with local statutory children’s agencies as appropriate.
- Procedures will be applied with common sense and judgement.
- Induction training will be provided for all temporary staff and volunteers. This will include training on the school’s Safeguarding procedures, the staff code of conduct, whistleblowing, e-safety, the identity of the DSLs and each will be asked to read and understand Part 1 and Annex A of KCSIE.
- All staff are given and expected to read and understand Part 1 and Annex A of KCSIE each time it is updated. They will also be given the Safeguarding policy which includes the Code of Conduct for staff.
- Supplementary training for all staff will happen informally at least annually.
- Through the PSHCE programme and in ICT lessons, children will learn about the issues surrounding safeguarding. They are taught how to adjust their behaviour to reduce risks, including safe use of electronic equipment and access to the internet. They are also guided towards building resilience to the risks of radicalisation.
- Staff will be given the training and support to ensure they have the skills, knowledge and understanding to keep children safe.
- The governors will ensure the school contributes to inter-agency working in line with ‘*Working Together to Safeguard Children*’ through effective implementation of the child protection policy and procedures, and good co-operation with local agencies.
- The school undertakes its duties under the Prevent scheme.
- The school has a Whistleblowing Policy and this can be found in the Staff Employment Handbook.
- For those working in EYFS, the school undertakes *Disqualification by Association* checks. This is in order to prevent the school from knowingly employing people if they or others they live or work with in their households are ‘disqualified’.
- Induction training for staff includes an explanation of:
  - the school’s E-Safety policy
  - the school’s Safeguarding policy
  - Annex A and Part 1 of KCSIE
  - the obligations required by ‘Prevent’
  - the school’s Whistleblowing policy
- The school follows locally agreed inter-agency procedures.

### **Guidance for Staff**

The most important thing to remember: REFER ON – do not keep information to yourself. You must inform the Designated Safeguarding Lead (DSL) (or the Deputy DSL or Headmaster in his absence), or the Local Authority Designated Officer (LADO) of any concern or allegation about school practices or the behaviour of colleagues which are likely to put pupils at risk of abuse or other serious harm. It is a statutory requirement that all concerns should be recorded however minor.

**Concerns about a pupil at risk or in need are made immediately to the DSL or Deputy DSL who will refer on to OSCB. Allegations against a member of staff or volunteer should be made to the Headmaster who will then refer on to the LADO.** Safeguarding is everyone’s responsibility and anyone can make a referral to children’s social care. **Do not** assume that somebody else will take action and **do** share information that might be critical in keeping children safe.

If you have a concern about a child, please fill in the ‘**Cause for Concern**’ form (see Appendix A), which can be found on ‘Staff Shared/Safeguarding’ and pass this on to the DSL within 24 hours.

It is important to differentiate between safeguarding children who have suffered or are at risk of suffering serious harm and those in need of additional support from one or more agencies. The former should be reported to OSCB immediately; the latter should lead to inter-agency support using local processes.

In their school-based Safeguarding training, staff are reminded that they should ensure that their actions and behaviour do not place pupils or themselves at risk of harm or of allegations of harm to a pupil. Such matters as one to one teaching, where staff are advised to ensure they can be seen by colleagues, are discussed at staff meetings and appropriate guidance given.

See also the Staff Handbook for further guidance for staff and also the Staff Code of Conduct.

Mobile phones staff have on the school premises should not be used to take photographs of the children. Mobile phones and cameras are not permitted in the EYFS setting.

### **Boarding**

It is important to note that:

- This policy is also for staff and other adults working in the school and older boarders in positions of responsibility.
- Senior pupils given responsibility over other pupils are given appropriate briefing for dealing with any allegations of abuse they may hear.
- There is a policy known to staff and used in practice, for taking appropriate action should a child (including a boarder) go missing.
- Boarders and their parents are informed about the possibility of reporting concerns or allegations to ISI (020 7600 0100). These contact details are also available on our website and in documents for boarders.
- Anyone will be given immunity from 'whistle-blowing' if they act in good faith over any allegation of abuse.
- The school is alert to issues that could arise between pupils and the potential for peer abuse. We would take appropriate disciplinary action if such an issue arose.
- If a member of the residential boarding staff is suspended pending an investigation of a child protection issue then alternative accommodation will be found for them away from the children in the boarding house.

### **Allegations Against Staff**

Staff know that they are obliged to 'whistle-blow' if they have concerns about a colleague and must inform the Headmaster without delay. Where there are concerns about the Headmaster, this should be referred to the Chair of Governors. (This can be done by contacting Mr Paul Daffern, Chairman of Governors, without informing the Headmaster).

Paul Daffern's details are below:

Email : [paul.daffern@dfrsmanagement.co.uk](mailto:paul.daffern@dfrsmanagement.co.uk) Mobile Phone: 07788 321270

Staff should also consult the Whistle-blowing Policy.

The School follows Part 4 of KCSIE (2018) in dealing with allegations of abuse against teachers and other staff. In all cases in which it is alleged that a person who works with children has:

(a) behaved in a way that has harmed a child, or may have harmed a child

(b) possibly committed a criminal offence against or related to a child or

(c) behaved toward a child or children in a way that indicates she or he is unsuitable to work with children

The School must follow LADO procedures where one or more of the criteria above is met. In operating the LADO procedures the School must consider whether the allegation can be properly investigated if the person concerned remains in work.

The School will seek advice about suspension and alternatives to suspension, and realises the final decision on these topics remains with the school. It would be very unusual for the School not to take the advice of the LADO, and if it were to do this the LADO may decide to take the issue to the Education Secretary.

If a member of staff, governor or volunteer is accused of abuse or improper conduct the Headmaster, Andrew Nott, must be informed as soon as possible. The school's procedures aim to strike a balance between the need to protect children and the need to protect staff and volunteers from false or unfounded allegations. These procedures follow the guidance in Part 4 of KCSIE (2018). The Headmaster liaises with Oxfordshire Child Protection team for guidance. If the Headmaster is absent, the allegation should be passed to the Chairman of Governors.

The school ensures that all staff, teaching and non-teaching, governors and volunteers understand that there is a procedure to be followed on all occasions. If an allegation is made against a teacher the quick resolution of that allegation must be a clear priority to the benefit of all concerned. At any stage of consideration or investigation, all unnecessary delays are eradicated. The local authority designated officer (LADO) will be informed within one working day of all allegations that come to the Headmaster's attention or that are made directly to the police. The School will not undertake its own investigations of allegations without prior consultation with the LADO, or in the most serious cases, the police, so as not to jeopardise statutory investigations. In borderline cases, the Designated Contact may discuss the case with the LADO informally and without naming the school or individual.

All allegations are to be reported straight away, to the Headmaster (or, in his absence, the Chair of Governors – please see the first paragraph of this section for his contact details).

The Headmaster will discuss the allegations with the LADO, consider the nature, content and context of the allegation and agree a course of action including any involvement of the police. Discussions will be recorded in writing, and communication with both the individual and the parents of the child/children agreed. The Headmaster will consider carefully whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place. The School will give due weight to the views of the LADO and the policy when making a decision about suspension.

The school is aware that there are restrictions on the reporting or publishing of allegations against teachers, and so would make every effort to maintain confidentiality and guard against unwanted publicity. These restrictions apply up to the point where the accused person is charged with an offence, or the DfE/Teaching Regulation Agency (TRA) publish information about an investigation or decision in a disciplinary case.

### **Allegation Against the DSL**

If the accused member of staff is the Designated Safeguarding Lead, the Headmaster (or Chairman of Governors if the Headmaster is unavailable) will be informed immediately without the DSLs knowledge and the Headmaster will seek guidance from the LADO on the best procedure. In the case of serious harm, the police should be informed from the outset.

## **Peer-on-Peer Abuse**

Any child-on-child abuse will be referred on to the Oxfordshire Safeguarding Children Board as a child protection concern. This may include sexting and any other relevant issues named in KCSIE (such as sexual violence or sexual harassment, physical abuse, sexting (or youth produced sexual imagery), initiation violence and rituals). The threshold employed is when the school believes there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm'. Abuse is abuse and should never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". A bullying incident will be treated as a child protection concern when there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. (See, also Anti-Bullying Policy).

All peer on peer abuse is unacceptable though it is more likely that girls will be victims and boys perpetrators. The victims will be supported by the school's pastoral team and will be offered counselling should that be necessary. Through annual training provided by Childnet, all staff receive training to help them become aware of how behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting can put children in danger. It is important to bear in mind that children with SEND can be more prone to peer group isolation than other children and such children are given special attention by the form teachers, Learning Support department and Senior Pastoral Tutors.

## **Child Abuse**

The basis of all child abuse is the failure to recognise a child's basic needs and respond to them. Our duty as professionals is to be open to the possibility that various forms of abuse may take place, to identify the indicators of such abuse and to ensure that our concerns are transmitted to others. Any delay in doing this might leave the child open to further, and possibly more serious, abuse and might result in a possible loss of evidence which could have been used to improve the child's position. We recognise that because of the day-to-day contact with children, school staff are ideally placed to observe the outwards signs of abuse. It is the role of the DSL and Deputy DSL to keep a secure record, to monitor and to refer cases as necessary to Children's Services. These documents are to be kept separate from the child's academic file.

According to KCSIE, abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or by another child or children. Children with special educational needs and/or disabilities may be particularly vulnerable.

Part 5 of KCSIE lists defines child abuse in this way:

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.

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.

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.

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

## Symptoms

The NSPCC lists some of the signs and behaviours which may indicate that a child is being abused: repeated minor injuries

- children who are dirty, smelly, poorly clothed or who appear underfed
- children who have lingering illnesses which are not attended to, deterioration in school work, or significant changes in behaviour, aggressive behaviour, severe tantrums
- an air of 'detachment' or 'don't care' attitude
- overly compliant behaviour
- a 'watchful attitude'
- sexually explicit behaviour (e.g. playing games and showing awareness which is inappropriate for the child's age), continual open masturbation, aggressive and inappropriate sex play
- a child who is reluctant to go home, or is kept away from school for no apparent reason
- does not trust adults, particularly those who are close
- 'tummy pains' with no medical reason
- eating problems, including over-eating, loss of appetite
- disturbed sleep, nightmares, bed wetting
- running away from home, suicide attempts
- self-inflicted wounds
- reverting to younger behaviour
- depression, withdrawal
- relationships between child and adults which are secretive and exclude others
- pregnancy

These signs are not evidence themselves; but may be a warning, particularly if a child exhibits several of them or a pattern emerges. It is important to remember that there may be other explanations for a child showing such signs. Abuse is not easy to diagnose, even for experts.

### **Child Sexual Exploitation (CSE)**

This involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups.

What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

### **Female Genital Mutilation (FGM):**

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Warning signs that FGM may be about to take place, or may have already taken place, can be found in the Multi-Agency Practice Guidelines. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. It is mandatory for us to report to the police cases where we discover that an act of FGM appears to have been carried out.

### **Children missing from education**

All children, regardless of their circumstances, are entitled to a full-time education, which is suitable to their age, ability, aptitude and any special educational needs they may have. A child going missing from education is a potential indicator of abuse or neglect and such children are at risk of being victims of harm, exploitation or radicalisation. At St Hugh's we have procedures in place for handling unauthorised absence and for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. If a pupil is added or removed from our admissions register at a non-standard transition (ie. where a compulsory school-aged child leaves before completing the school's final year or joins after the beginning of the school's first year) then the local authority is informed.

### **The 'Prevent' duty**

Protecting children from the risk of radicalisation should be seen as part of schools' wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways.

Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. School staff should use their

professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme.

Our responsibilities under the Prevent Duty involve four general themes, namely risk assessment, working in partnership, staff training and IT policies, and include the following:

- Assessing the risk of pupils being drawn into terrorism, including extremist ideologies
- Continuing to work in partnership with local authorities
- Ensuring that all staff complete the Channel online training module to give them an awareness of the issues involved with this subject
- Ensuring the DSL and Deputy DSL undertake Prevent awareness training
- Ensuring that suitable filtering and monitoring is in place on school internet, and that school ICT training for pupils and staff includes the risks of radicalisation and the dangers of extremism. This is reflected in the ICT Acceptable Use policies.
- Ensuring that any visiting speakers are checked to ensure they are suitable and then appropriately supervised when in school.

### **Advice for Staff when dealing with disclosure**

*The following procedure is based upon the Oxfordshire Safeguarding Procedures and the National Minimum Boarding Standards.*

- Always stop and listen straight away to anyone who wants to tell you about incidents or suspicions of abuse.
- Explain that you would like to make notes of what they are telling you and write a short account of what is being said using the 'Cause for Concern' report form (Appendix A).
- **Do not give a guarantee of confidentiality.** Talk through the issue of confidentiality with the child. You can guarantee that you 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; that you will never tell anyone who does not have a clear 'need to know'; and that you will personally take whatever steps you can to protect the informing pupil or adult from any retaliation or unnecessary stress that might be feared after a disclosure of alleged abuse has been made.
- Avoid asking leading questions like, 'What did s/he do to you?' Instead try, 'What do you want to tell me?' or 'Is there anything else you want to say?'
- Any member of staff who is told of any incident or has strong suspicion of physical or sexual child abuse occurring to a pupil in School, at home or outside the School, must report the information immediately (within 24 hours) to the designated member of staff or the Headmaster in their absence, or to the OSCB.
- School staff should not investigate reports of physical or sexual abuse themselves. Alleged victims, perpetrators, those reporting abuse and others involved will not be interviewed by School staff beyond the point at which it is clear that there is an allegation of abuse.
- Ensure the child is handed onto a sympathetic, appropriate environment when he/she leaves you, **do not leave him/her on his/her own.**

- After reporting the allegation to the appropriate senior member of staff, the staff member should also make a written record as soon as possible of what they have been told using the 'Safeguarding - Cause for Concern' form and hand a copy to the DSL or Deputy DSL.
- If an allegation is made against a member of staff/volunteer then this should be reported directly to the Headmaster (or in his absence the Chairman of Governors) who will deal with the matter in conjunction with the DSL or Deputy DSL and following the school's disciplinary procedures as well as safeguarding procedures.
- If an allegation is made against the Headmaster then it should be immediately brought to the attention of the Chairman of Governors, without the Headmaster being told first. The Chairman of Governors will contact the LADO for further advice.
- All allegations must be referred to the LADO for advice before any investigations take place. In the case of serious harm, the police should be informed from the outset.
- If there has been a substantiated allegation against a member of staff, the school will work with the LADO to decide on any improvements to procedures or practices.

### **The role of the DSL & Deputy DSL**

The DSL and Deputy DSL take lead responsibility for safeguarding and child protection.

### Managing referrals

The DSL and Deputy DSL are expected to:

- refer cases of suspected abuse to the local authority children's social care as required;
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the Police as required.

### Working with others

The DSL and Deputy DSL are expected to:

- liaise with the Headmaster to inform him of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the "case manager" and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member); and
- liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.
- act as a source of support, advice and expertise for staff.

### Training

The DSL and Deputy DSL should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The DSLs should undertake Prevent awareness training. In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to and understands the school's Safeguarding policy and procedures, especially new and part time staff;
- are alert to the specific needs of children in need, those with special educational needs and young carers;
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

### Raising Awareness

The DSL and Deputy DSL should:

- ensure the school's Safeguarding policy is known, understood and used appropriately;
- ensure the school's Safeguarding policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this; and
- link with the local LSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

### Child Protection records

Where children leave the school their child protection file is transferred to the new school or college. This is transferred separately and securely from the main pupil file, and a confirmation of receipt is obtained. Correspondingly, the school requests child protection records from feeder schools.

### Availability During term time

The DSL and Deputy DSL are always available (during school hours) for staff to discuss any safeguarding concerns. Their email and contact numbers are available to all staff.

### **The process which the DSL or Deputy DSL will follow:**

*Upon receiving an allegation of physical/sexual abuse, the DSL or Deputy DSL will:*

- Limit questioning to the minimum necessary to seek clarification, avoiding 'leading' the pupil or adult by making suggestions or asking questions that introduce their ideas about what may have happened.
- Stop asking any more questions as soon as the pupil or adult has disclosed that he believes that something abusive has happened to him or to someone else.
- Tell the informing pupil/adults that he will now make sure the appropriate people are brought in. In the first instance this will be the Headmaster, as well as informing the School Governor overseeing Safeguarding, Mrs Anna Coull. Parents will be informed as long as this does not put the child at further risk of harm and the school does require parental consent for referrals to statutory agencies.

- Ask the informing pupil/adult what steps they would like taken to protect them now that they have made an allegation and assure them that the School will try to follow their wishes. Take any steps needed to protect any pupil involved from risk of immediate harm as well as considering any child who may have specific needs (educational or physical).
- Refer the matter immediately (within 24 hours) to the Oxfordshire Safeguarding Children Board (see below for contact details) either in writing (using the required Referral Form) or with written confirmation of a telephoned referral.
- In the event that an allegation is made against a member of staff, the school will not impose a threshold test for referral to the LADO but pass on any concerns or allegations immediately. The LADO will decide what is beyond the threshold test.
- If the allegation is made against the DSL or Deputy DSL, the Headmaster will refer this directly to the LADO and not discuss this with the DSL or Deputy DSL.
- Follow any requests given by the Oxfordshire Safeguarding Children Board with regard to:
  1. informing a pupil's parents
  2. medical examination or treatment for the pupil
  3. immediate protection needed for a pupil who has been the victim of abuse, a pupil who has given information about abuse and a pupil against whom an allegation has been made.
  4. informing people at School (including any other members of staff) of the allegation
  5. attending Case Conferences
- Inform the pupil/adult who made the initial allegation of what the next steps are to be, having agreed these with the Oxfordshire Safeguarding Children Board.
- If there is no reasonable alternative, suspend from duty, pending investigation, any staff member alleged to have abused a pupil or pupils. If the member of staff is the Head, the Chairman of Governors will undertake this action. Suspension of staff should not be a default response to an allegation.
- Take any necessary steps for the longer-term protection and support of each pupil who has made allegations of abuse, or is alleged to have suffered from abuse, taking his/her wishes fully into account.
- Ensure that any pupil being interviewed by the police has a supportive member of staff of his/her own choice to accompany him.
- Notify DfE of any allegation that is being investigated by the Oxfordshire Safeguarding Children Board and/or police.
- Ensure co-operation by the School in any subsequent investigation by Oxfordshire Safeguarding Children Board or police.
- Make arrangements where feasible for any pupil who has been the subject of abuse to receive any necessary continuing counselling and support by agreement with his/her parents where

appropriate. This will also be available to staff should they require support relating to the stress and upset of dealing with a disclosure.

- Inform, (as an instance of 'serious harm to a pupil'):
  1. The Local District Health Authority
  2. The Police
  3. The Department of Health, at CS2C, Room 2~6, Wellington House, 133-155 Waterloo Road, London, SE1 SUG

The School will consider taking disciplinary action against any member of staff, or agent of the School, where it believes pupils are at risk of abuse from that member of staff, even in cases where there is to be no criminal prosecution.

The School may apply appropriate sanctions to pupils who are found to have made malicious allegations. This could include temporary or permanent exclusions or referral to the police if a criminal offence may have been committed.

Allegations found to be malicious should be removed from personnel records. Records of all others must be kept but any that are not substantiated, are unfounded or malicious should not be referred to in employer references.

A referral will be made to the Teaching Regulation Agency (TRA) 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 for such an order are 'unacceptable professional conduct, 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'.

The School understands its obligation to report to the Disclosure and Barring Service (DBS) within one month of leaving the school any person (whether employed, contracted, a volunteer or student) whose services are no longer used because he or she is considered unsuitable to work with children; its address for referrals is PO Box 181, Darlington DL1 9FA (tel 01325 953 795).

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 designated member of staff will discuss these with the Oxfordshire Safeguarding Children Board where necessary and record them appropriately.

### **Whistleblowing**

It is vital that as a school we have a culture of safety and of raising concerns. There are clear procedures for reporting and handling concerns and further details can be found in the Staff Employment Handbook and in the school's Whistleblowing Policy. The Contacts section below has the telephone number of NSPCC which may be a helpful source of advice for staff wishing to whistle blow.

### **Procedure**

Any Concerns? Follow the Safeguarding policy and immediately tell the DSL (Designated Safeguarding Lead) i.e. Nick Armitage (Deputy Head) or Deputy DSL, Sally Russell (Head of Pre-Prep). You are also allowed to report a concern directly yourself.

## SAFEGUARDING CONTACT DETAILS

Designated Safeguarding Lead (DSL): <b>Nick Armitage</b>		<a href="mailto:armitagen@st-hughs.co.uk">armitagen@st-hughs.co.uk</a>  <a href="mailto:russells@st-hughs.co.uk">russells@st-hughs.co.uk</a>
Deputy DSL: <b>Sally Russell</b> (i/c EYFS)		<b>01367 870700</b>
Chairman of Governors: <b>Paul Daffern</b>		Email: <a href="mailto:paul.daffern@dfsrmanagement.co.uk">paul.daffern@dfsrmanagement.co.uk</a>
Governor with responsibility for Safeguarding: <b>Anna Coull</b>		Email: <a href="mailto:safeguarding@st-hughs.co.uk">safeguarding@st-hughs.co.uk</a>
<b>Queries or “No Names Consultation” contact:</b>		<b>0345 2412608</b>
Locality Community Support Worker		(Ginny Stock <a href="mailto:ginny.stock@oxfordshire.gov.uk">ginny.stock@oxfordshire.gov.uk</a> 07775 025262) or <a href="mailto:lcss.south@oxfordshire.gov.uk">lcss.south@oxfordshire.gov.uk</a>
<b>New referrals</b> and named enquiries go to Oxfordshire’s Multi-Agency Safeguarding Hub (MASH)		<b>0345 050 7666</b>  <a href="mailto:mash-childrens@oxfordshire.gcsx.gov.uk">mash-childrens@oxfordshire.gcsx.gov.uk</a>
Alison Beasley	<b>Local Authority Designated Officer (LADO)</b>	<b>01865 810603 (general) 01865 815956 (direct)</b> <a href="mailto:alison.beasley@oxfordshire.gov.uk">alison.beasley@oxfordshire.gov.uk</a>
Donna Crozier	Assistant Designated Officer	<b>01865 816956</b>
CAMHS	Family Assessment and safeguarding service (FASS)	<b>01865 902418</b>  <b>FASS@oxfordhealth.nhs.uk</b>
Police	Child Abuse Investigation Unit	<b>01865 335 200</b>
	Police Enquiry Centre	<b>101(non-emergency Police telephone number)</b>
Ofsted Complaints		<b>0300 123 1231</b>
NSPCC Child Protection Helpline		<b>0800 800 5000</b>
CEOP (Child Exploitation and Online Protection)		<a href="http://www.thinkuknow.co.uk">www.thinkuknow.co.uk</a>
DBS (Disclosure and Barring Service), PO Box 181, Darlington DL1 9FA (tel 01325 953 795).		<a href="mailto:Customerrelations@db.s.gsi.gov.uk">Customerrelations@db.s.gsi.gov.uk</a>  <b>01325 953 795</b>
Oxfordshire Safeguarding Children Board – Access website for local procedure concerning all aspects of safeguarding, including ‘Prevent’.		<a href="http://www.oscb.org.uk">www.oscb.org.uk</a>  <a href="mailto:oscb@oxfordshire.gov.uk">oscb@oxfordshire.gov.uk</a>  <b>01865 815843</b>

## PREVENT CONTACT DETAILS

Contact OSCB (see above) and ask for the LADO.

Anti-Terrorist Hotline	0800 789321
Crime Stoppers	0800 555111
The Department of Education dedicated telephone and mailbox for non-emergency advice for staff and governors	0207 3407264
The Government website in respect of Prevent	<a href="mailto:counter-extremism@education.gsi.gov.uk">counter-extremism@education.gsi.gov.uk</a>
Additional websites in respect of Prevent	<a href="http://www.gov.uk/report-suspicious-activity-to-mi5">www.gov.uk/report-suspicious-activity-to-mi5</a>
	<a href="http://www.gov.uk/report-terrorism">www.gov.uk/report-terrorism</a>
The Prevent Strategy	<a href="http://www.gov.uk/government/policies/protecting-the-uk-against-terrorism/supporting-pages/prevent">www.gov.uk/government/policies/protecting-the-uk-against-terrorism/supporting-pages/prevent</a>
	<a href="http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97976/prevent-strategy-review.pdf">www.gov.uk/government/uploads/system/uploads/attachment_data/file/97976/prevent-strategy-review.pdf</a>
The Prevent Duty	<a href="#">Prevent duty guidance - Publications - GOV.UK</a>

## SAFEGUARDING CHILDREN – CAUSE FOR CONCERN

**If you have concerns about a child, complete this form and discuss the concerns with the Designated Safeguarding Lead (DSL) as soon as possible (within one working day).**

**DSLs:** Nick Armitage (Deputy Head) – Lead DSL; Sally Russell (Head of Pre-Prep) – Deputy DSL; Andrew Nott (Headmaster – please contact him separately if your concern is about the behaviour of an adult)

If you are concerned about an injury e.g. a bruise, use the body map to identify the position and be specific about the size, and colour of the bruise on the body.

If a child has made a disclosure, do not promise to keep it a secret. Tell the Designated Safeguarding Lead (DSL) immediately and write down everything the child has told you.

**N.B. At all stages confidentiality is crucial.**

<b>Child's Name:</b>	<b>Form:</b>
<b>Date concern noted:</b>	
<b>Nature of concern:</b> (Please give <u>full details</u> of the nature of the concern, ensuring that you record <u>dates</u> , <u>times</u> , <u>frequencies</u> , as appropriate and any relevant conversations with the child.)	
<b>Staff member's name:</b>	
<b>Signature:</b>	
<b>Date passed on to DSL:</b>	

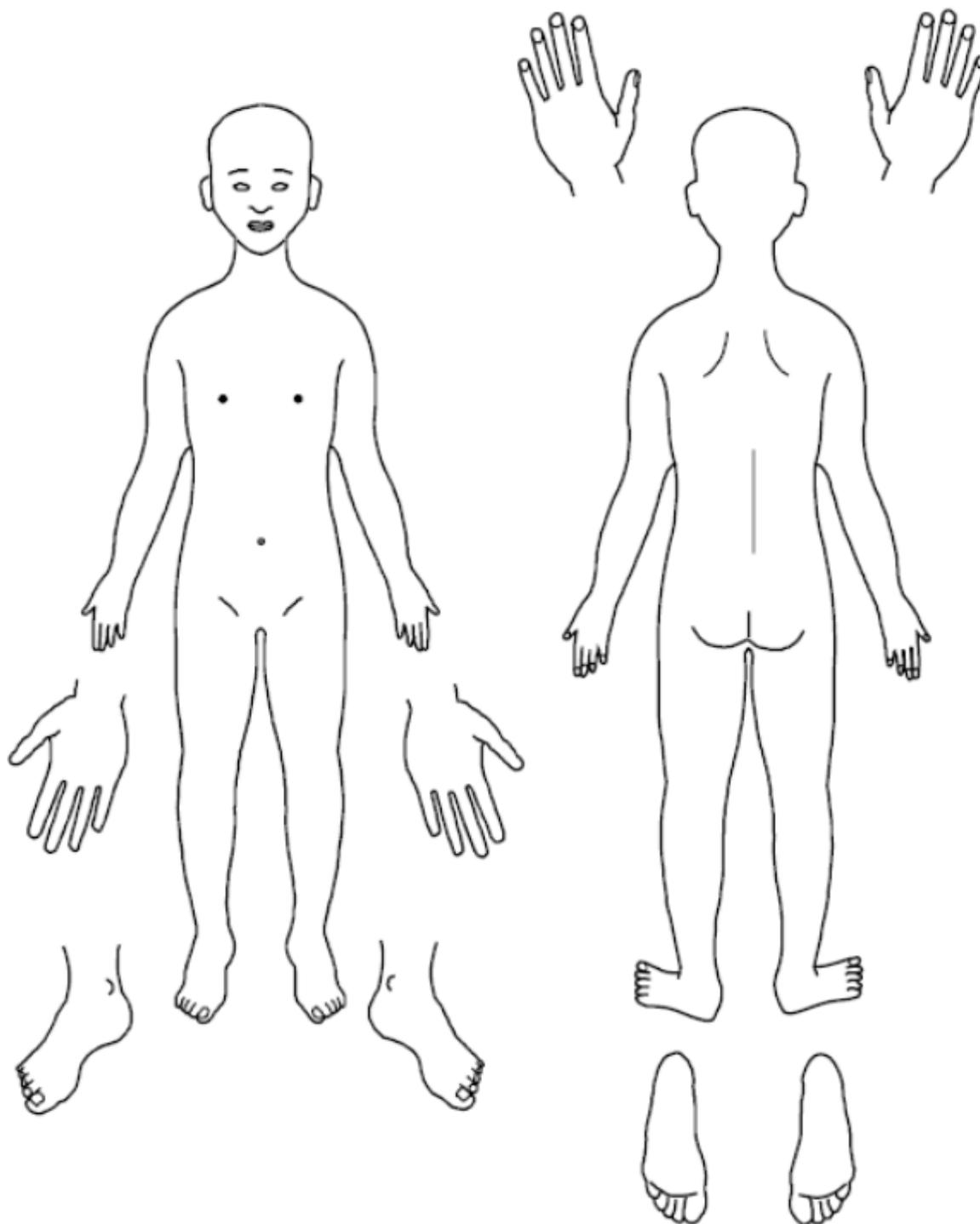
**Initial action taken:** (this section might include details of initial enquiries of the child, consultation with the DSL, contact with OSCB, any contact with or explanations from mother/ father/carers etc.)

**Date:**                      **Time:**                      **DSL Signature:**

\*This report to be filed in the Headmaster's Safeguarding file which is kept locked in his office.

## Body Map

If you note down any marks/bruises/injuries on this page, please take this immediately to the Nurse on duty in the Medical Centre and do not investigate any further yourself.



## RECRUITMENT POLICY

### Introduction

St Hugh's School is committed to providing the best possible care and education to its pupils and to safeguarding and promoting the welfare of children and young people. The School is also committed to providing a supportive and flexible working environment to all its members of staff. The School recognises that, in order to achieve these aims, it is of fundamental importance to attract, recruit and retain staff of the highest calibre who share this commitment.

The aims of the School's recruitment policy are as follows:

- to ensure that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position
- to ensure that all job applicants are considered equitably and consistently
- to ensure that no job applicant is treated unfairly on any grounds including race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age
- to ensure compliance with all relevant recommendations and guidance including the recommendations of the Department for Education (DfE) in *Keeping Children Safe in Education (September 2018)*
- to ensure that the School meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks

Employees involved in the recruitment and selection of staff are responsible for familiarising themselves with and complying with the provisions of this policy.

### Recruitment & Selection procedure

All applicants for employment will be required to complete an **application form** containing questions about their academic and employment history and their suitability for the role. Incomplete application forms will be returned to the applicant where the deadline for completed application forms has not passed. A curriculum vitae will not be accepted in place of the completed application form. Applicants will receive a job description and sometimes a person specification for the role applied for.

The applicant may then be invited to attend a **formal interview** at which his/her relevant skills and experience will be discussed in more detail by two members of staff, at least one of whom will have been trained in Safer Recruitment. Any gaps in a CV will be discussed and recorded and a written record of the outcome of the interview will be kept.

Any offer to a successful candidate will be conditional upon:

- Receipt of at least two satisfactory references (if these have not already been received). Where electronic references are received, we ensure that they originate from a legitimate source and documented as such;
- Verification of identity and qualifications including, where appropriate, evidence of the right to work in the UK;
- A satisfactory enhanced DBS check and if appropriate, a check of the Barred List maintained by the DBS;
- For a candidate to be employed as a teacher, a check that that the candidate is not subject to a prohibition order issued by the Secretary of State;
- Verification of professional qualifications, where appropriate;
- For a candidate involved in the leadership and management of the school, a check (via DBS) to ensure that the person is not prohibited from being involved in school management.
- Verification of successful completion of statutory induction period (for teaching posts - applies to those who obtained QTS after 7 May 1999);
- Where the successful candidate has worked or been resident overseas such checks and confirmations as the School may consider appropriate, including an EEA check, so that any relevant events that occurred outside the UK can be considered; and
- Satisfactory medical fitness.
- A Disqualification by Association (under the Child Care Act 2006) check

We advise that anyone appointed to a post involving regular contact with children or young people must be medically fit. It is the School's responsibility to be satisfied that employees of the School have the appropriate level of physical and mental fitness **before** an appointment is confirmed.

It is the School's practice that a successful candidate must complete a pre-employment health questionnaire. The information contained in the questionnaire will then be held by the School in strictest confidence. This information will be reviewed against the Job Description and the Person Specification for the particular role, together with details of any other physical or mental requirements of the role i.e. proposed workload, extra-curricular activities, and layout of the School.

The School is aware of its duties under the Equality Act 2010. No job offer will be withdrawn without first consulting with the applicant, considering medical evidence and considering reasonable adjustments.

In accordance with the National Minimum Standards for Boarding Schools, newly appointed staff may not begin work (or residence) at the School until satisfactory completion of all checks and receipt of references. In exceptional circumstances, **but not in boarding**, if a DBS check is delayed, then a short period of work is allowed under controlled conditions, at the Headmaster's discretion. The Headmaster may allow the member of staff to commence work:

- without confirming the appointment;
- after a satisfactory check of the barred list;
- provided that the DBS application has been made in advance;
- with appropriate safeguards taken (for example, supervision);
- safeguards reviewed via a risk assessment at least every two weeks;
- the person in question is informed what these safeguards are;

In such situations, a note is added to the Single Central Register and evidence kept of the measures put in place.

In the EYFS setting we do not allow people whose suitability has not been checked, including through a criminal records check, to have unsupervised contact with children being cared for. Where a new member of staff starts work before the disclosure is available, we would ensure that the person is supervised at all times (i.e. not loose supervision), all other checks (including barred list) having been completed satisfactorily.

We follow the EYFS Statutory Framework and ensure that all staff understand the safeguarding policy and procedures, and all have up to date knowledge of safeguarding issues. Training is made available which enable staffs to identify signs of possible abuse and neglect at the earliest opportunity, and to respond in a timely and appropriate way. These may include:

- significant changes in children's behaviour;
- deterioration in children's general well-being;
- unexplained bruising, marks or signs of possible abuse or neglect;
- children's comments which give cause for concern;

- any reasons to suspect neglect or abuse outside the setting, for example in the child's home; and/or
- inappropriate behaviour displayed by other members of staff, or any other person working with the children. For example: inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role and responsibilities; or inappropriate sharing of images.

### **Pre-employment checks**

In accordance with the recommendations of the DfE in *Keeping Children Safe in Education (September 2018)* the School carries out a number of pre-employment checks in respect of all prospective employees.

### **Verification of identity and address**

All applicants who are invited to an Interview will be required to bring the following evidence of identity, right to work in the UK, address and qualifications:

- A current driving licence including a photograph or a passport or a full birth certificate;
- A utility bill or financial statement issued within the last three months showing the candidate's current name and address;
- Where appropriate any documentation evidencing a change of name;
- Where the candidate is not a citizen of a country within the European Economic Area or Switzerland, proof of entitlement to work and reside in the UK.

The School asks for the date of birth of all applicants (and proof of this) in accordance with the DfE's guidance. Proof of date of birth is necessary so that the School may verify the identity of, and check for any unexplained discrepancies in the employment and education history of all applicants. The School does not discriminate against applicants on the grounds of age.

### **References**

References will usually be taken up on short listed candidates prior to interview. All offers of employment will be subject to the receipt of a minimum of two references which are considered satisfactory by the School. One of the references must be from the applicant's current or most recent employer. If the current/most recent employment does/did not involve work with children, then the second referee should be from the employer with whom the applicant most recently worked with children. Neither referee should be a relative or someone known to the applicant solely as a friend.

All referees will be asked whether they believe the applicant is suitable for the job for which they have applied and whether they have any reason to believe that the applicant is unsuitable to work with children. All referees will be sent a copy of the job description and person specification for the role which the applicant has applied for. If the referee is a current or previous employer, they will also be asked to confirm the following:

- the applicant's dates of employment, salary, job title/duties, reason for leaving, performance, sickness and disciplinary record
- whether the applicant has ever been the subject of disciplinary procedures involving issues related to the safety and welfare of children (including any in which the disciplinary sanction has expired)
- whether any allegations or concerns have been raised about the applicant that relate to the safety and welfare of children or young people or behaviour towards children or young people

The School will only accept references obtained directly from the referee and it will not rely on references or testimonials provided by the applicant or on open references or testimonials.

The School will compare all references with any information given on the application form. Any discrepancies or inconsistencies in the information will be taken up with the applicant and the relevant referee before any appointment is confirmed.

The National Minimum Standards for Boarding Schools require that direct contact be made with the referees of any person applying for a position working with boarders. The School goes beyond those standards by making direct inquiries with referees of applicants for all positions.

### **Disclosure & Barring Service (DBS)**

Due to the nature of the work, the School applies for an enhanced disclosure from the DBS in respect of all prospective staff members, governors and volunteers. An enhanced disclosure will contain details of all convictions on record (including those which are defined as "spent" under the Rehabilitation of Offenders Act 1974) together with details of any cautions, reprimands or warnings held on the Police National Computer. An enhanced disclosure will also reveal whether an applicant is barred from working with children or vulnerable adults by virtue of his/her inclusion on the lists of those considered unsuitable to work with children or vulnerable adults maintained by the Independent Safeguarding Authority. An enhanced disclosure may also contain non-conviction information from local police records which a chief police officer thinks may be relevant in connection with the matter in question.

DBS checks will be requested for applicants with recent periods of overseas residence and those with little or no previous UK residence. These applicants will also be asked to provide further information, including proof of the right to work in the UK and the equivalent of a disclosure, if one is available in the relevant jurisdiction(s).

The School expects ancillary workers/supply/temporary worker agencies/contractors that are used by the School to register with the DBS on their own account and to provide written confirmation that all relevant checks have been carried out in respect of staff supplied to the School. Proof of registration will be required before the School will commission services from any such organisation. The School still requires to see a copy of their DBS before they start work. The School will independently verify the identity of staff supplied by such an agency.

### **Policy on recruitment of ex-offenders**

- As an organisation using the Disclosure and Barring Service (DBS) checking service to assess applicants' suitability for positions of trust, St Hugh's complies fully with the Code of Practice and undertakes to treat all applicants for positions fairly. It undertakes not to discriminate unfairly against any subject of a DBS check on the basis of a conviction or other information revealed.
- St Hugh's is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability or offending background.
- We have a written policy on the recruitment of ex-offenders, which is made available to all DBS applicants at the outset of the recruitment process.
- We actively promote equality of opportunity for all with the right mix of talent, skills and potential and welcome applications from a wide range of candidates, including those with criminal records. We select all candidates for interview based on their skills, qualifications and experience.
- For those positions where a DBS check is required, all application forms, job adverts and recruitment briefs will contain a statement that a DBS check will be requested in the event of the individual being offered the position.
- Where a DBS check is to form part of the recruitment process, we encourage all applicants called for interview to provide details of their criminal record at an early stage in the application process. We request that this information is sent under separate, confidential cover, to the Headmaster and we guarantee that this information will only be seen by those who need to see it as part of the recruitment process.
- Unless the nature of the position allows the School to ask questions about your entire criminal record, we only ask about 'unspent' convictions as defined in the Rehabilitation of Offenders Act 1974.

- We ensure that all those at St Hugh's who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences. We also ensure that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.
- At interview, or in a separate discussion, we ensure that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment.
- We make every subject of a DBS check aware of the existence of the Code of Practice and make a copy available on request.
- We undertake to discuss any matter revealed in a DBS check with the person seeking the position before withdrawing a conditional offer of employment.

### **Retention and security of disclosure information**

The School's policy is to observe the guidance issued or supported by the DBS on the use of disclosure information. In particular, the School will:

- store disclosure information and other confidential documents issued by the DBS in locked, non-portable storage containers, access to which will be restricted to members of the School's senior management team
- not retain disclosure information or any associated correspondence for longer than is necessary. Generally this will be for a maximum of six months. The School will keep a record of the date of a disclosure, the name of the subject, the type of disclosure, the position in question, the unique number issued by the DBS and the recruitment decision taken
- ensure that any disclosure information is destroyed by suitably secure means such as shredding
- prohibit the photocopying or scanning of any disclosure information

The School complies with the provisions of the DBS code of practice, a copy of which is available on request.

### **Retention of records**

If an applicant is appointed, the School will retain any relevant information provided on their application form (together with any attachments) on their personnel file. If the application is unsuccessful, all documentation relating to the application will normally be confidentially destroyed after six months.

Reviewed: February 2018

Review date: October 2019

## STAFF CODE OF CONDUCT

### Introduction

- This policy sets out clear guidance on the standards of behaviour expected from all staff at St Hugh's School. The principles underlying the guidance aim to encourage staff to achieve the highest possible standards of conduct and minimise the risk of inappropriate conduct occurring.
- School staff are in a unique position of trust and influence as role models for pupils. Therefore, staff must adhere to behaviour that sets a good example to all pupils within the school.
- Staff also have an individual responsibility to maintain their reputation and the reputation of the school, both inside and outside working hours and work setting.
- This policy applies to all staff and volunteers in the school regardless of their position, role or responsibility. References to 'staff' throughout the policy relate to all of the following groups:
  - All members of staff including teaching and support staff
  - Volunteers, including governors
  - Casual workers
  - Temporary and supply staff, either from agencies or engaged directly
  - Student placements, including those undertaking initial teacher training and apprentices.
- St Hugh's School requires that all staff have read and agree to comply with this policy.
- Breach or failure to observe this policy will result in action being taken under the school disciplinary procedures including, but not limited to, dismissal.
- This code of conduct is not an exhaustive list of acceptable and unacceptable standards of behaviour. In situations where guidance does not exist in this policy staff are expected to exercise their professional judgement and act in the best interests of the pupils and the school.

### Professional Behaviour and Conduct

- Staff are expected to demonstrate the highest possible standards of personal and professional conduct and behaviour and consistently act with honesty and integrity. St Hugh's School expects staff to treat each other, pupils, parents and the wider community with dignity and respect at all times.
- Staff must act in accordance with their duty of care to pupils and ensure that the safety and welfare of pupils are accorded the highest priority.
- Staff should show fairness in their treatment of children and avoid behaviours such as embarrassing or humiliating pupils, making jokes at the expense of pupils, discriminating against or favouring pupils and sarcasm.

- Staff must have regard for the ethos and values of the school and must not do or say anything which may bring the school or governing body into disrepute. Care should be taken by staff to avoid any conflict of interest between activities undertaken outside school and responsibilities within school. Staff should act in accordance with the school's policies and procedures at all times.

### **Dress and Appearance**

- We recognise that dress and appearance are matters of personal choice and self-expression. However, all staff must dress in a manner that is appropriate to a professional role and that promotes a professional image.
- Staff should dress in a manner that is not offensive, revealing or sexually provocative and in a manner that is absent from political or contentious slogans.
- Staff should dress safely and appropriately for the tasks they undertake.
- Tattoos and body art should be covered while staff are in school.
- Discreet earrings are acceptable but all other body piercings should be removed while on school premises.

### **Smoking, alcohol and other substances**

- St Hugh's is a non-smoking site.
- Staff must not smoke on school premises or outside school gates.
- Any member of staff wishing to smoke must leave the school grounds.
- Staff must not smoke whilst working with or supervising pupils offsite.
- Staff must not consume or be under the influence of alcohol, illicit drugs or other illegal substances on or near school premises when pupils are present, unless at events organised by the school, such as the staff/governors annual dinner.

### **Relationships with pupils**

- Staff must maintain professional boundaries with pupils appropriate to their position and must always consider whether their actions are warranted, proportionate, safe and applied equitably. Staff should act in an open and transparent way that would not lead any reasonable person to question their actions or intent. Staff should think carefully about their conduct so that misinterpretations are minimised.
- Staff must not establish or seek to establish social contact with pupils for the purpose of securing a friendship or to pursue or strengthen a relationship. If a young person or their parents seek to establish social contact you should exercise your professional judgement in making a response and be aware that such social contact could be misconstrued.
- Staff must not develop personal relationships with pupils or their parents/guardians that are known to them solely through their professional life.
- Staff should make the Headmaster aware of any tutoring they may be asked to do in the holidays or at weekends
- *Working Together to Safeguard Children* defines sexual abuse as ... '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)'.

- Staff should be mindful of section 16 of The Sexual Offences Act 2003.
- Staff must not make sexual remarks to a pupil, discuss their own sexual relationships with, or in the presence of, pupils or discuss a pupil's relations sexual relationships in an inappropriate setting or context.
- Contact with pupils should be through St Hugh's authorised mechanisms i.e. school email addresses, home/school books. Personal phone numbers, email addresses or communication routes via all social media platforms should not be used and staff should not share their home address with pupils or their parents. The exception to this would be if a member of staff has a child at the school and is contacting the parent re play dates etc. If contacted via an inappropriate route the member of staff must inform the Headmaster immediately.
- Staff must not accept friend invitations or become friends with any pupil or parents/guardians of St Hugh's School on any social media platform unless they know them personally and not through their professional life. Staff should also refrain from following the Twitter or other similar social media accounts of pupils or their parents. Staff must read the school's e-safety policy carefully and follow all advice and guidance contained within it.

### **Infatuations**

- It is not unusual for pupils or, sometimes, their parents to develop infatuations towards members of staff. All such situations must be responded to sensitively to maintain the dignity of those concerned.
- Staff should also be aware that such circumstances carry a high risk of words or actions being misinterpreted and for allegations to be made against staff.
- Any indications of an infatuation towards yourself or another member of staff must be reported to the Headmaster.

### **Gifts/Hospitality**

- Staff need to take care that they do not accept any gift/offer of hospitality that might be construed as a bribe by others, or lead the giver to expect preferential treatment. However, there may be occasions where pupils or parents wish to give a small token of appreciation to staff, for example at religious festivities or at the end of the year.
- It is unacceptable to receive gifts on a regular basis or to suggest to pupils that gifts are appropriate or desired. Money must not be accepted as a gift. If you are unsure whether to accept a gift you should consult the Headmaster.

### **Physical Contact with Pupils**

- There are occasions when it is entirely appropriate and proper for staff to have physical contact with pupils, but it is crucial that they only do so in ways appropriate to their professional role. A 'no touch' approach is impractical for most staff and may in some circumstances be inappropriate. When physical contact is made with pupils it should be in response to their needs at that time, of limited duration and appropriate to their age, stage of development, gender, ethnicity and background.
- Where feasible, staff should seek the child's permission before initiating contact. Staff should listen, observe and take note of the child's reaction or feelings and, so far as is possible, use a level of contact which is acceptable to the child for the minimum time necessary.

- Occasionally a pupil, most likely in the EYFS, may require some help and support with intimate and personal care including toileting, medical care, dressing, undressing or washing. It is therefore essential that intimate and personal needs are met whilst ensuring the highest standards of safety, privacy, respect and dignity are maintained.
- It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one child in one set of circumstances may be inappropriate in another, or with a different child. Staff should therefore, use their professional judgement at all times.
- Staff should be aware that even well intentioned physical contact may be misconstrued by the child, an observer or by anyone to whom this action is described. Staff should never touch a child in a way which may be considered indecent. Always be prepared to explain actions and accept that all physical contact be open to scrutiny. Staff must not engage in rough play, tickling or fun fights with pupils.
- Extra caution should be exercised where a child is known to have suffered previous abuse or neglect. Such experiences may sometimes make a child exceptionally needy and demanding of physical contact and staff should respond sensitively by deterring the child through helping them to understand the importance of personal boundaries.
- Staff supervising PE and games or providing musical tuition should demonstrate the use of a particular piece of equipment/instrument on another member of staff if possible. However, they may be required to initiate physical contact with pupils to support a child to perform a task safely, to demonstrate the use of a particular piece of equipment/instrument or to assist them with an exercise. Contact under these circumstances should be done with the pupil's agreement, for the minimum time necessary and in an open environment. Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the pupil/student
- Physical contact must never be secretive, for the gratification of the adult or represent a misuse of authority.
- If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be reported to the Headmaster, recorded and, if appropriate, a copy placed on the child's file.

### **Use of Restraint**

- Staff may legitimately intervene to prevent a pupil from committing a criminal offence, injuring himself or others, causing damage to property, engaging in behaviour prejudicial to good order and to maintain good order and discipline.
- Staff should have regard to the health and safety of themselves and others.
- Before using force, staff should, wherever practicable, tell the pupil to stop misbehaving and communicate in a calm and measured manner throughout the incident. Staff should not give the impression of acting out of anger or frustration, or to punish a pupil, and should make it clear that physical contact or restraint will stop as soon as it ceases to be necessary.
- There is no legal definition of reasonable force. The use of any degree of force is unlawful if the circumstances do not warrant it. Any force should be the minimum needed to achieve the desired result.
- The following kinds of physical intervention are reasonable:
  - Interposing between pupils or blocking a pupil's path

- Holding
- Pushing
- Pulling
- Leading a pupil by the arm or shepherding a pupil away by placing a hand in the centre of the back.
- The following would be deemed unreasonable:
  - holding a pupil by the neck or collar
  - slapping
  - punching
  - twisting limbs or holding or pulling by the hair
  - anything that could constrict breathing.
  - require specific expertise or training
- Any incident where force has been used would be considered to be very serious. Any teacher who has had to use force in whatsoever circumstances, must immediately make an oral report to the Headmaster and prepare a signed and dated written report by the beginning of the next working day.
- Parents should be told when and where the incident took place, which members of staff were directly involved (anonymised where necessary), why they decided that force had to be used, what force was used, whether there were any injuries and what follow-up action (support and/or disciplinary) was being taken in relation to their child.

### **Child in distress**

- There may be occasions when a pupil is in distress and in need of comfort as a reassurance. This may include age appropriate physical contact. Staff should remain self-aware at all times in order that their contact is not threatening, intrusive or subject to misinterpretation.
- If you have a particular concern about the need to provide this type of care and reassurance you should seek further advice from the Headmaster.

### **Boarding**

- Those involved in boarding need to ensure the privacy of boarders is of paramount importance.
- Staff should always knock, then wait before entering a dormitory.
- Boarders are permitted into the House Parents living room and kitchen when invited. Where this happens, the boarding staff will be mindful of the need to comply with the Code of Conduct.

### **Changing**

- Pupils are entitled to respect whilst they are changing before or after PE/games. However, there needs to be an appropriate level of supervision in order to safeguard young people and meet health and safety requirements. The supervision should be appropriate to the needs and age of the pupils and sensitive to the potential for embarrassment.
- Staff should be vigilant about their own behaviour when helping children change in and out of clothes for PE and other activities.

### **One to one situations**

- Staff working individually with pupils should be aware of the potential vulnerability of pupils and staff in such situations. Staff should manage these situations with regard to the safety of the pupil and to themselves.
- Individual work with pupils should not be undertaken in isolated areas or rooms where there is no external viewing panel. Where it is necessary to close doors for reasons of confidentiality a colleague should be made aware of this and asked to remain vigilant.

### **Transporting pupils**

- In certain circumstances it may be appropriate for staff to transport pupils offsite, for example sports fixtures, outings or other out of school activities. The Bursar must oversee the plan and provide oversight of all transport arrangements and to respond to any difficulties that may arise
- The Bursar should ensure that the transport arrangements and the vehicle meet all legal requirements. Staff should ensure that the driver has the appropriate license for the vehicle, that the vehicle is roadworthy, has a valid MOT certificate and is appropriately insured and that the maximum capacity is not exceeded.
- Staff should ensure that the driver is not distracted while the vehicle is in motion for any reason other than an emergency. Children must all be secured with 3 point seatbelts and must be over 135cm tall to sit in the front seat.
- Prior to transporting pupils offsite consent must be obtained from pupil parent/guardian and staff should be aware that the safety and welfare of the pupils is their responsibility until this is safely passed back to their parent/carer.

### **E-Safety**

- Staff should follow St Hugh's School's E-Safety policy for staff and the Acceptable Use Policy at all times and have regard for St Hugh's School's E-Safety policy for pupils.
- Staff must not engage in inappropriate use of social network sites which may bring themselves, the school or the school community into disrepute. Staff should adopt the highest security settings on any personal profiles they have.
- Staff should remain mindful of their digital footprint and exercise caution in all their use of social media or any other web based presence they have. This includes written content, videos or photographs and views expressed either directly or by 'liking' certain pages or posts or following certain individuals or groups. Staff should exercise care when using dating websites where staff could encounter students.
- Staff must not make contact with pupils, must not accept or initiate friend requests nor follow pupils' or their guardians' accounts on any social media platform. Staff must not communicate with pupils or their guardians via social media, websites, instant messenger accounts or text message. The only acceptable method of contact is via the use of school email accounts or telephone equipment.
- Staff should not make contact with pupils' family members, accept or initiate friend requests or follow pupils' family member's account on any social media platform.
- However, the school acknowledges that staff who are also parents may wish to make contact with other parents, who are friends, over social media. Staff must exercise caution and professional judgement in these circumstances and should not have any contact with pupils' family members via social media if that contact is likely to constitute a conflict of interest or call into question their objectivity.

- Mobile phones should not be used during lessons or formal school time unless used by certain members of the SLT who are part of an emergency communication chain. Mobile phones should be switched off (or silent) at all times.
- Mobile phones and personally-owned mobile devices brought in to school are the responsibility of the device owner. St Hugh's School accepts no responsibility for the loss, theft or damage of personally-owned mobile phones or mobile devices.

### **Photography, video and images of children**

- Many school activities involve recording images as part of the curriculum, extra school activities, publicity or to celebrate an achievement. In accordance with The Data Protection Act 1998 the image of a pupil is personal data. Therefore, it is a requirement under the Act for consent to be obtained from the parent/guardian of a pupil for any images made. It is also important to take into account the wishes of the pupil, remembering that some pupils do not wish to have their photograph taken or be filmed.
- Using images for publicity purposes will require the age-appropriate consent of the individual concerned and their parent/guardian. Images should not be displayed on websites, in publications or in a public place without their consent (which is sought on entry into the school).
- Staff should also be clear about the purpose of the activity and what will happen to the photographs/images/video footage when the lesson or activity is concluded.
- Photographs/stills or video footage of pupils should only be taken using school equipment for purposes authorised by the school and should be stored securely and only on school equipment. When a personal device has to be used (eg. When 'Earwig' is used for example) then staff should ensure no images are stored on their device.
- All photographs/stills and video footage should be available for scrutiny and staff should be able to justify all images/video footage made.
- Staff should remain aware of the potential for images of pupils to be misused to create indecent images of children and/or for grooming purposes. Therefore, careful consideration should be given to how activities which are being filmed or photographed are organised and undertaken.
- Particular care should be given when filming or photographing young or vulnerable pupils who may be unable to question how or why the activities are taking place. Staff should also be mindful that pupils who have been abused through the use of video or photography may feel threatened by its use in a teaching environment.

### **Confidentiality**

- Members of staff may have access to confidential information about pupils, their parents/carers or their siblings. Staff must not reveal such information except to those colleagues who have a professional role in relation to the pupil on a need to know basis.
- Staff should never use confidential or personal information about a pupil or her/his family for their own, or others' advantage (including that of partners, friends, relatives or other organisations). Information must never be used to intimidate, humiliate, or embarrass the pupil.
- All staff are likely at some point to witness actions which need to be confidential. For example, where a pupil is bullied by another pupil, this needs to be reported and dealt with in accordance with the appropriate school procedure. It must not be

discussed outside the school, including with the pupil's parent or carer, nor with colleagues in the school except by a senior member of staff with the appropriate authority to deal with the matter.

- Staff have a statutory obligation to share with the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead any information which gives rise to concern about the welfare or safety of a pupil/student or that might suggest a pupil/student is in need or at risk of significant harm. Staff should pass on information without delay in accordance with the school's safeguarding policy and procedures and this should be recorded. Staff must never promise a pupil that they will not act on or pass on any information that they are told by the pupil.
- If you are in any doubt about whether to share you should seek guidance from the DSL or Deputy DSL.
- Any media or legal enquiries should be passed to the Headmaster and only approved staff and Governors should communicate to the media about the school.

### **Whistleblowing/Speaking Out**

- Whistleblowing/Speaking Out is the mechanism by which staff can voice their concerns, without fear of repercussion.
- All school staff have a duty to report any behaviour by a colleague which raises concern.
- Staff should refer to Whistle Blowing policy for further guidance. This is particularly important where the welfare of pupils may be at risk.

### **Compliance**

- All staff must complete the form in appendix 1 to confirm they have read, understood and agree to comply with this Code of Conduct.
- This form will be signed and dated and a copy retained on the member of staff's file.

### **Confirmation of compliance**

I hereby confirm that I have read, understood and agree to comply with St Hugh's School's Staff Code of Conduct.

Name .....

Position/Post Held.....

Signed ..... Date .....

Last Review: February 2018

Review Date: February 2019