



BRADFIELD COLLEGE

Safeguarding and Child Protection Policy

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1.1	S Davies	28.11.17	Update to 2. Response to Concerns about a Child Update to last two paragraphs of 3. Response to Signs of Child Abuse Update to paragraph iv of 4. Response to a Disclosure of Child Abuse, under Subsequent action by the DSL (or her Deputies) and The DSL will:

1.2	S Davies	19.02.18	<p>Update to Page 3 – Insertion of Mission Statement</p> <p>Update to Page 4– Addition of Annex A to KCSIE</p> <p>Update to Page 5 – Reference to Deputy Head Pastoral’s KCSIE questionnaire sent post safeguarding training</p> <p>Update to Page 7 – Reference to SEND Pupils and specific vulnerabilities</p> <p>Update to Page 8 – Clarification on physical evidence of abuse</p> <p>Update to Page 21 – Reference to Page 3 rather than section 8</p>
1.3	S Davies	15.05.18	<p>Update to Page 5 - Sexual violence and sexual harassment between children</p> <p>Update to Page 29 – Addition of reference material - Sexual violence and sexual harassment between children in schools and colleges December 2017</p>
2.0	S Davies and S Williams	06.06.2019	<p>Update to Page 3 – Deputy DSL Information updated, All references to KCSIE have been changed to September 2018 throughout the document</p> <p>Update to Page 4 and 5 – The Nature of Child Abuse updated</p> <p>Update to Page 6 – Response to Concerns about a Child</p> <p>Update to Page 12 – Abuse by a Member of College Staff: Response to Allegations</p> <p>Update to Page 15 – Allegation judged Unfounded</p> <p>Update to Page 25 – Peer-on-Peer Abuse</p> <p>Update to Page 25 – Child-on-Child sexual violence and sexual harassment</p> <p>Update to Page 26 – Reasonable Force and the Restraint of a Pupil</p> <p>Update to Page 27 – College Statement of Boarding Principles – whereabouts of pupils</p> <p>Update to Page 30 – Documents list reviewed and dates amended</p>

2.1	S Davies	14.02.19	<p>Created a Contents Page</p> <p>Update to Page 11 – Addition of Response to Child at Risk</p> <p>Update to Page 13 – Update to Documentation information</p> <p>Update to Page 15 – Addition of how Staff can contact the Warden</p> <p>Update to Page 18 – Update to whom the LADO may refer the employee/volunteer to</p> <p>Update to Page 28 – Child Protection Officers changed to Designated Safeguarding Leads</p> <p>Update to Page 28 – Update to location of Mission Statement (Page 5)</p> <p>Update to Page 29 – Addition to Peer-on-Peer Abuse – procedures to minimise risks of Peer-on-Peer Abuse.</p> <p>Update to Page 30 – Addition of Victim and Perpetrator Support</p> <p>Update to Page 32 – Addition of Online and Social Media Activities</p> <p>Update to Page 32 – Sexual Offences (Amendment) Act 2003</p> <p>Update to Page 36 – Updated LADO information Update to Page 37 – Documents list reviewed, and dates amended</p> <p>Note taken that West Berkshire LSCB will change to West Berkshire Local Safeguarding Partnerships (LSP) during 2019.</p> <p>Document reviewed to change Child Protection Policy to Safeguarding and Child Protection Policy throughout</p>
2.2	S Davies and S Williams	01.09.19	<p>Update to Page 5 – updated KCSIE 2019 date</p> <p>Update to Page 7 – Inclusion of Up-skirting information</p> <p>Update to Page 8 – Inclusion Up-skirting information Update to Page 9 – Addition of Preventing Youth Violence and Gang Involvement information</p> <p>Update to Page 13 – Change of Date Update to Page 32 – Inclusion of Up- skirting</p> <p>Update to Page 34 – Teaching Online Safety and updated KCSIE date</p> <p>Update to Page 38 – Updated KCSIE date</p>

2.4	S Davies and S Williams	15.10.19	<p>Update to page 5 – Change of Date + A Logan added to list of DDSLs. Table of Contents updated</p> <p>Update to page 6 – additional details of induction training added.</p> <p>Update to page 7 – Bullet on Abuse up-dated to correspond with content of latest KCSIE material on. Sexual Abuse up-dated, also to correspond with content of latest KCSIE.</p> <p>Update to page 8 – material added on sexual violence and re-ordering of the whole text in places to improve clarity. Update to page 9 – addition of section dealing with “County Lines”.</p> <p>Update to pages 10 & 11 – Enhancement to Section 4 to meet requirement of <i>Working Together</i> and general reordering of the text to read more smoothly. Final sentence at end of Section 2 on LSPs and inter-agency working.</p> <p>Update to pages 13-15 – insertion of Section 5 dealing with Peer-on-Peer abuse.</p> <p>Update to pages 27– references to on-line abuse inserted to clarify scope of policy.</p> <p>Update to pages 29 & 30 – Additions to the description of the DSL’s responsibilities to specify e-safety role. Update to page 30 – reference to on-line abuse added to section on HsMs.</p> <p>Update to pages 32 – references to on-line risk added to section on pupils.</p> <p>Update page 34 – reference included on child-on-child sexual harassment and further reference on up-skirting.</p> <p>Update page 36 – enhanced material on Online and Social Media Activities (section vii) to cover internet monitoring and the use of 3G/4G technologies</p>
2.5	S Davies	18.03.20	<p>Insertion of section 12 viii to facilitate face-to-face on-line working with pupils at home, in the context of the Coronavirus pandemic and HMG policy on social distancing as a means of contagion control</p>



BRADFIELD COLLEGE

Safeguarding and Child Protection Policy

Last Revised: 18 March 2020

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Safeguarding Mission Statement

Bradfield College is committed to providing a caring, friendly and safe environment for all its pupils so they can learn in a relaxed and secure atmosphere. The College takes seriously its responsibility to protect and safeguard its pupils. Ours is a TALKING school. This means that anyone who has worries about a pupil in the College ought to talk about it. Telling is not “dobbing in” or “grassing”.

1. The Nature of Child Abuse

Bradfield places Safeguarding at the top of its list of priorities. All Bradfield employees, volunteers and contractors' employees are required to be aware of the signs of abuse and neglect, so they are able to identify pupils in need of help or protection, and are trained so they then take appropriate action. This policy document sets out the actions that **MUST** be followed if there is any suspicion that a child is at risk of abuse. Employees are warned that wealth and privilege offer no guarantees that a child is safe and are reminded that all who work with children should be consistently open to the reality that any child, from any background, could be subject to actual or potential abuse. As it says on the Blue CP Card: "It could happen here!"

On appointment, all employees, volunteers and contractors' employees are given a copy of the "Blue Card" identifying the DSL and her team. They are also given this policy and a copy of Part One (and, where relevant to their role, Annex A: Further Information) of *Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges (2 September 2019)* and asked to confirm that they have read and understood the document. On-line safeguarding is emphasised alongside physical safety.

The Staff Code of Conduct is given out at the same time and makes clear what is expected in employees' /volunteers' behaviour whilst working with children. The College's Whistleblowing Policy is discussed, along with the pupil Behaviour Policy; appropriate relationships between staff and pupils (including relationships on-line and on social media) are also mentioned.

All these documents are discussed face-to-face with new appointees, in their induction meeting with one of the DSL's safeguarding team, who also explains the College's protocols for dealing with an incident where a pupil is missing from school and explains the possible further safeguarding implications of repeated absence from school.

All employees and volunteers will know what to do if they develop concern about a child. The importance of raising such concerns expeditiously with the DSL will be covered in training.

KCSIE (2019) gives clear guidance and stresses that **all staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most case multiple issues will overlap with one another.**

- **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly on line, or technology may be used to facilitate off line abuse. Children may be abused by an adult or adults or by another child or children.
- **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. Sexual abuse can take place on line, and technology can be used to facilitate off line abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.
- **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.

KCSIE (2019) also discusses important issues that have to be given serious attention: Domestic violence; gang violence, child sexual exploitation, female genital mutilation, honour-based violence, forced marriage, children missing education and radicalisation can all involve the abuse of children, and members of staff will be expected to familiarise themselves with these issues by following the appropriate links in KCSIE. A questionnaire is sent out to those who have recently completed Safeguarding Training, to confirm they have read and understood KCSIE (2019) and, where appropriate to their role, Annex A.

It is important that all who work at Bradfield understand that abuse of children is not solely something done by adults. **Peer-on-peer abuse** is commonplace, and staff need to be alert to the possibility. Activities pupils may wish to dismiss as "banter" and on-line actions like

“sexting” can constitute child abuse. “Up-skirting” (taking a clandestine photograph of a child’s genitals or buttocks) is a criminal offence, punishable by two years in prison, and an increasingly common form of peer-on-peer abuse.

Bradfield staff must also understand that **sexual violence** and **sexual harassment** can occur between two children of any sex and can take place on line. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Staff need to be mindful of this issue in their assessment of any suspicious group behaviour they encounter at school.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. **Sexual violence** and sexual harassment exist on a continuum and may overlap, they can occur online and offline (and be both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Bradfield staff should be aware:

- that it is more likely that girls will be the victims of sexual violence and more likely that sexual harassment will be perpetrated by boys.
- of the importance of making clear that sexual violence and sexual harassment is never acceptable, will never be tolerated and is not an inevitable part of growing up;
- that it is not acceptable to tolerate sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”;
- that they must always challenge behaviours (which are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia. Dismissing or tolerating such behaviours risks normalising them.

Sexual harassment is likely to violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (Bradfield College will always consider if such actions cross the line into sexual violence - it will always talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature;
- up-skirting, where a picture is taken under a person’s clothing, without them knowing, for the purposes of sexual gratification or the humiliation of the victim;
- online sexual harassment, which might include: non-consensual sharing of sexual images and videos and sharing sexual images and videos (both often referred to as sexting); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

Sexual harassment (as set out above) creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

Children who are **Lesbian, Gay, Bi, or Trans** (LGBTQ+) can be targeted by their peers. In some cases, a child who is perceived by their peers to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+.

Children with **Special Educational Needs and Disabilities** (SEND) can be especially vulnerable. Disabled and deaf children are three times more likely to be abused than their peers. Additional barriers can sometimes exist when recognising abuse in SEND children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability, without further exploration;
- the potential for children with SEND being disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs;
- communication barriers and difficulties overcoming these barriers.

It is important that all who work at Bradfield are aware of **'County Lines'**, a term used when drug gangs from big cities expand their operations to smaller towns, often using violence to drive out local dealers and exploiting children and vulnerable people to sell drugs. A common feature in county lines drug supply is the exploitation of young and vulnerable people. The dealers will frequently target children to act as drug runners or move cash so they can stay under the radar of law enforcement.

Dealers often use dedicated mobile phone lines, known as 'deal lines', to take orders from drug users. Heroin, cocaine and crack cocaine are the most common drugs being supplied and ordered. In some cases, the dealers will take over a local property, normally belonging to a vulnerable person, and use it to operate their criminal activity from. This is known as 'cuckooing'.

Children exploited in this way will quite often be exposed to physical, mental and sexual abuse, and in some instances will be trafficked to areas a long way from home as part of the network's drug dealing business. These involved often don't see themselves as victims or realise they have been groomed to get involved in criminality.

2. Concerns about a Child and Responses

All employees, volunteers and contractors' employees at Bradfield have a central role in the pastoral care of children. They must be alert to signs that things are not well in the life of a child and, if they develop **any sense that things are not right**, they must act on this immediately, expeditiously bringing their concern to the attention to the pupil's HsM.

A member of staff must never assume a colleague will take action and share information that might be critical in keeping a child safe and must act **in every instance** where they feel concerned. Everyone

needs to be mindful that early information sharing is vital for effective identification, assessment and support of vulnerable children.

Pupils of general Pastoral concern are evaluated each week by HsMs. This evaluation is published to Teaching Staff and Matrons weekly, as an online list of Pupil Concerns. Welfare Plans are held on many pupils of concern, for example those on medication, or who are deemed “at risk”. The list of those requiring such plans is fixed by the Deputy Head Pastoral and is reviewed at least termly. The Welfare Plans are reviewed as required (and in every instance at least once a term) and will be read by all Tutors and Matrons in a pupil’s house and by Trip Leaders for overnight trips. Plans are accessed on the Pastoral Dashboard on Firefly and the Deputy Head Pastoral will monitor tutors’ scrutiny of these plans.

In circumstances where an employee or volunteer develops any **concern that a child may be at risk of harm** they will report this to the DSL. They will do this even if the level of concern is only mild and will make the report promptly, as soon as the concern develops. It is for the DSL to determine the significance of any such concern and the responsibility of College staff is simply to report all such concerns without inhibition.

If, following a report of concern, **a child is identified as “at pastoral risk”**, by the DSL, an entry will be made on the Pastoral Tracking file for that pupil, and recorded on the Safeguarding Concerns Register maintained in the DSL’s Office. This register is reviewed on a regular basis at least once every term. The DSL may determine that specific enhanced pastoral support for the child is required and agree an appropriate Welfare Plan with the pupil’s HsM and the wider pastoral team.

In circumstances where the reported concern seems to the Deputy Head/DSL to represent *prima facie* an actual **safeguarding matter where significant harm to a child is potentially at issue**, the DSL will open a file in the College Child Protection Register and discuss the matter with the Contact, Advice and Assessment Team (CAAS) at West Berkshire Council (01635 503 090). The Berkshire West Local Safeguarding Partnership (LSP) <https://www.berkshirewestccg.nhs.uk/about-us/how-we-work-with-others/berkshire-west-multi-agency-safeguarding-arrangements/> is subdivided into local LSCBs and West Berkshire LSCB procedures specify threshold criteria and the DSL will make her assessment in light of these criteria and follow the LSP/LSCB’s specified procedures, participating in inter-agency working as required.

When a child is identified as “at significant risk of harm”, by the DSL, she will contact the police, in addition to children’s services, if crime has been committed or there is reasonable suspicion a criminal activity is planned. All contacts with partner agencies will be made within 24 hours of the DSL’s receipt of the report of concern about the child in question. College staff will be reminded in training that they are also able to make such referrals directly to the police and children’s services and should do so if the need for swift action is evident to them; they will be reminded that they do not need the consent of parents to make referrals to a statutory agency. In addition to the in-hours CAAS service on 01635 503 090 there is an out of hours services “Emergency Desk” on 1344 786 543 (edt@bracknell.forest.gov.uk)

Even in a setting such as Bradfield College it is important that employees and volunteers are aware of signs indicating a child may be at risk of or involved in serious crimes. These are set out in detail in Preventing Youth Violence and Gang Involvement (March 2015) and includes

positive attitudes towards delinquency, involvement in anti-social behaviour, aggression, truancy and substance misuse. These issues will be discussed as part of the Safeguarding training offered to College staff and volunteers. Children with family members or friends outside school apparently involved in anti-social behaviour or on the fringes of criminal activity will be subject to particularly careful evaluation by pastoral staff.

3. Signs of Child Abuse and Responses

All employees, volunteers and contractors' employees at Bradfield have a central role in identifying any abuse of children (and not only abuse taking place within College). They are expected expeditiously to report any signs or suspicions that a child is being abused to the DSL or one of her deputies.

Staff must be alert to signs of:

- **Physical Abuse:** Bruises, scratch marks, sprains, bites, burns, scalds. The child may seek to cover up evidence of abuse and be unwilling to become involved in games (especially swimming) or, even in hot weather, may wear clothing covering limbs.
- **Emotional Abuse:** The child may exhibit depressive, difficult or disturbed behaviour (e.g. aggressive or destructive action, an inability to sustain relationships with peers). The child may seek adult attention and/or affection (e.g. choosing the company of adults – matron, a teacher – rather than that of his/her peers; inventing reasons to join in conversations with a teacher or HsM). The pupil may seek physical contact, or compensate by self-harming, over-eating, drinking, drug or substance abuse.

Parents may appear fussy and over-protective. They may interfere with the development of independence, self-esteem and personal competence that are part of the child's normal growth. They may be unreasonably strict in their discipline exhibiting "Victorian patterns of parenting".

- **Sexual Abuse:** Non-physical signs include: sudden changes in mood or behaviour, a knowledge of sexual matters (or vocabulary) far in advance of what is normative at their chronological age, a marked lack of trust in adults and an inability to develop and sustain stable relationships with their peers. They may try to win or buy friends. Indications of a wish to disguise physical attractiveness (e.g. by over-eating or radical hair cutting) may be significant. The importance of "sixth sense" indicators should not be under-estimated: a sense that one is inexplicably disconcerted when entering a room where all *looks* well between the occupants should not just be ignored. Over-rationalising can dismiss primary, instinctive impressions that are actually significant and warrant further investigation.
- **Neglect:** Irregular visits, by parents, or to home in term-time, with no apparent contact by letter or telephone, may be significant. The child's clothing may be old

and/or in poor repair, he/she may be short of pocket money and tuck. Indications of limited parental supervision of weekend leave or poor provision of meals at weekends might be significant.

- **Child sexual exploitation:** is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. Child sexual exploitation and forms of so-called 'honour based' violence including female genital mutilation (FGM) are child abuse and attempts to draw children into violent extremism should also be treated as a safeguarding issue. If a teacher discovers that an act of FGM appears to have been carried out on a girl under the age of 18 the teacher must report this to the police.

A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual exploitation:

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

Staff must also be alert to the **general signs of abuse** which include:

- Disobedience, attention-seeking or aimless behaviour;
- Anti-social behaviour or delinquency;
- Hysterical attacks or sudden/violent changes in mood;
- Misuse of alcohol or other drugs;
- Changes in eating patterns, including loss of appetite, faddiness or an excessive preoccupation with food;
- Severe sleep disturbance with vivid dreams and/or nightmares;
- Inability to concentrate, or a sudden drop in College performance;
- Social isolation, poor peer-group relationships, an inability to make friends;
- Truancy or a reluctance to take weekend leave;
- Self-mutilation;
- Talk of or attempts at suicide.

As has been mentioned, pupils with special educational needs are often more vulnerable to manipulation and abuse by adults and by their own peers. All pupils with a SEND profile are

flagged in the College's data management system and staff are required to note this aspect of a child's profile when they teach them or have pastoral dealings with them. The special vulnerabilities of pupils with SEND profile is addressed in Safeguarding INSET.

On receipt of a report that a child is presenting such identified signs of actual or potential abuse, the DSL will open a file in the College Child Protection Register and discuss the matter with the Contact, Advice and Assessment Team (CAAS) at West Berkshire Council.

Once in every term, the DSL will contact the HsMs of pupils listed in the Child Protection Register and request a brief report on their progress and wellbeing.

4. Peer on Peer Abuse and Responses

Bradfield College maintains a zero-tolerance policy towards all forms of peer-on-peer abuse and seeks to ensure that no form of any such abuse (no matter how 'low level' it may appear) is ever dismissed as a joke or banter.

Peer-on-peer abuse can take many forms including: actual sexual violence; instances of sexual harassment; peer-on-peer physical abuse; sexting; initiation rites (or "hazing") which have historically been a commonplace problem in boarding communities; ritual violence; up-skirting. The abuse is often gendered in character and staff need to be aware that developing adolescent attractions and relationships have the potential to become "nasty".

The College aims to take a Contextual Safeguarding approach that takes into account the particular risks that children at Bradfield are most likely to be exposed to, and the nature of the abuse they are most likely to experience – including online. To this end, the College will conduct a proactive risk assessment to determine the more likely risks to which its students are or may be exposed, assess and monitor those risks, and keep the assessment under annual review. It will put in place action plans to address identified risks and keep these under regular review. The outcome of the risk assessment will inform the school's peer-on-peer abuse policy, inform the College's curricular work on Safeguarding and its informal pastoral work, and be considered in governors' oversight of safeguarding at the College.

The College has consulted its Local Safeguarding Partnership's Safeguarding Policy and Procedures and takes account of local thresholds. It understands that peer-on-peer abuse is a complex issue and often an indicator of wider safeguarding concerns. It understands that addressing peer-on-peer abuse may require effective partnership working within the LSP.

The College recognises that institutional attitudes can underpin abuse behaviour amongst peers and aims to keep attitudes and conventions of tolerance under review so that inappropriate behaviour is better recognised and addressed with expedition. Fundamental to Bradfield's approach is the active promotion of gender equality and equalities associated with race, sexual orientation and gender identity. The College is committed to the promotion of positive values and healthy relationships and seeks to embed ongoing, systematic education and training (both of pupils and staff) throughout the institution.

In its response to expressions of concerns or explicit allegations of peer-on-peer abuse, the College will always seek to act in a manner that is sensitive, proportionate and prompt. It is

obviously helpful if the identity of the alleged abuser(s) is specified in any disclosure. However, a pupil(s) disclosing abuse will never be pressed to reveal names during the initial disclosure (such details can be dealt with as the disclosure is followed up by the Children's Social Services, Police or College). It is particularly important that the person receiving a disclosure of abuse by pupils will never attempt to guess the identity of the pupil(s) being spoken of.

On receiving report of any expressions of concern or specific allegation of peer-on-peer abuse, the DSL will contact West Berkshire Children's Services and/or the police immediately (and, in any event, within 24 hours of becoming aware of the alleged behaviour) and discuss the concern(s) or allegation(s) with the agency and agree on a course of action. This may include:

- managing the concern/allegation internally with help from external specialists where appropriate and possible;
- undertaking/contributing to an inter-agency early help assessment, with targeted early help services provided to address the assessed needs of a child/children and their family;
- referring the child/children to children's services for a Section 17/Section 47 statutory assessment and/or reporting alleged criminal behaviour to the police.

Working Together to Safeguard Children (2018) sets out to correct common myths about the laws of privacy, data protection and confidentiality that can hamper effective keeping and sharing of records in cases of alleged or suspected peer-on-peer abuse. Bradfield College understands that if there are legitimate safeguarding concerns about a child, then data protection law allows schools and professionals to share and retain even the most sensitive personal data as necessary to support their policies (even when it is not feasible to obtain consent). It also understands that the records it keeps relating to concerns or allegations of peer-on-peer abuse must be accurate, clearly describe the nature of the alleged behaviour without using euphemisms, and contain only information adequate for the purpose. Because these records are likely to contain highly impactful, sensitive personal data about children. Bradfield will take care when creating them and ensure that they are accessed on a need-to-know basis only, and by trained and appropriate staff. Further, those with responsibility for compiling the records will bear in mind that the records may need to be provided to the children involved and/or their parents in the future and take care that the notes and related communications are concise, factual and objective, focused only on what is necessary for their safeguarding purpose. Where note is made of opinion or unsubstantiated judgement this material will be clearly flagged as non-objective, non-factual data. The recording of non-objective opinion will take place only when it is judged necessary by the DSL and the making of such records will always be minimised. The language used in the notes will always be appropriate and professional.

Where the College considers that disciplinary action is appropriate for any child/children involved in child-on-child abuse it will take account of any ongoing police proceedings and, in such circumstances, work fully in partnership with the police and/or children's services. Where the matter is not of interest to the police and/or children's services, the College, will seek to take disciplinary action appropriate to ensure positive behaviour management. Before finalising any disciplinary response, the College will always consider its duty to safeguard from harm all children in its care; any identified underlying reasons for a child's behaviour; any unmet needs, or harm or abuse suffered by the child at issue; the risk that child may pose to other children; and the severity of the peer-on-peer abuse.

The College understands that in circumstances of peer-on-peer abuse both the victim and the perpetrator will require on-going pastoral and educative support, going forward, and the provision of such support will form part of the disciplinary record made of the College's response to any incident.

The response of Bradfield to concerns or allegations of peer-on-peer abuse will, further, form part of the College's ongoing proactive work to embed best practice. The response by the College can become part of its wider prevention work.

5. Disclosure of Child Abuse and Responses

Reportedly, children who have been abused attempt to tell an adult, on average, eight times before they are heard; Bradfield seeks to ensure its children are not let down in this way.

A child may confide in any member of staff – they do not always go to teachers or matrons. All staff at Bradfield College will therefore be aware that they might sometimes be chosen by a pupil as the recipient of disclosure and will know how to respond appropriately.

In such circumstances the member of staff will remember that he/she:

- has a listening role;
- must always take seriously what is being said;
- must never give an undertaking of absolute confidentiality;
- must explain that the substance of the disclosure will be passed on, but only to those who need to know, and that the child will be told when this happens;
- should not interrupt the child until he/she has completed what he/she wishes to say;
- may, if necessary, make brief, rough notes during the disclosure;
- must seek clarification of what is being said only by asking open questions (it is NOT APPROPRIATE to lead the child in any way, to guess or to make suggestions); may clarify what the child has said only when it is necessary to determine if child abuse is at issue (it is NOT APPROPRIATE for the member of staff to clarify the details of the abuse);
- may reassure the child that his/her disclosure is in line with the College's Safeguarding Mission Statement;
- must ensure that the pupil feels secure once the disclosure is concluded. (It may be appropriate to hand the child, with their assent, into the care of the House Matron or their HsM, or some other carer, saying that they have been upset. If this is necessary, the disclosure of abuse must not be mentioned, under any circumstances);
- must make a note of the disclosure and pass it on as quickly as possible, as soon as is reasonably practicable (and always on the same day as that on which the disclosure was heard). This note must record the time, date, place and people present, as well as what was said by the child (either during, or immediately after, the disclosure). It must be signed/dated. It must note any observed physical evidence (e.g. injuries or bruises - staff should never ask to see a reported injury; this point relates only to injuries that are immediately evident) and record the non-verbal behaviour of the pupil and the actual language used by the pupil when making the disclosure. This note may be used in any

subsequent court proceedings and so is an extremely important contemporary record, so it must be made with REAL CARE;

- must pass on the notes to:
 - the DSL or her Deputies (unless the disclosure relates to an employee or volunteer working at the College);
 - the Headmaster if the disclosure constitutes an allegation against a member of the College staff or a volunteer working at the College;
 - the Warden if the disclosure constitutes an allegation against the Headmaster;
- must under no circumstances carry out their own investigation into the allegation of abuse.

The member of staff's formal involvement will end at this point, although he/she may have an informal role supporting or monitoring the child.

Other than in circumstances where the member of staff is traumatised by the disclosure and feels in need of medical help or professional counselling, staff must not discuss the disclosure with anyone outside the College, and only discuss it within the College with individuals having a clear "need to know. In circumstances where the member of staff is feeling traumatised by what they have heard they should only discuss what they have been told with a qualified counsellor. The College provides free access to counselling in such circumstances.

Keeping Children Safe in Education (2019) makes it clear that anybody can refer a Child Protection issue to Children's Social Services. A member of staff should feel free to call the Duty Desk at West Berkshire: Telephone number 01635 503 090, email child@westberks.gov.uk.

The College recognises that a child who is abused may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth. We recognise that the College may provide the only stability in the lives of children who have been abused or who are at risk of harm. The College has age appropriate systems in place for children to express their views and give feedback so that their wishes or feelings will be taken into account when determining what action to take and what services to provide. However, the child's wishes or feelings cannot override the duty to refer suspected abuse to children's social care or police.

The College will provide continuing support to a pupil who has disclosed abuse through promoting a caring and safe environment within the College and encouraging self-esteem and self-assertiveness through the curriculum and through relationships. In doing so, the College will act in accordance with guidance from the relevant authorities to ensure that, for example, legal proceedings are not compromised.

Subsequent action by the DSL (or her Deputies)

In dealing with disclosures of actual or potential abuse that are passed on, the DSL (or her Deputies) will follow guidance given in:

- Berkshire West LSP Procedures
<https://www.berkshirewestccg.nhs.uk/media/2740/bwscp-multi-agency-safeguarding-arrangementsv3.pdf> and <https://www.westberkslscb.org.uk/>
- “What to Do if You’re Worried a Child is Being Abused: Advice for Practitioners” (2015);
- Working Together to Safeguard Children (September 2018)

The DSL will:

- i. Read, sign and date notes of a disclosure and warn the member of staff who made them to discuss the matter with no-one;
- ii. Refer the allegation to the Headmaster in circumstances where the disclosure is actually about a member of Bradfield Staff (or volunteer working at the College)
- iii. Open a file on the pupil in the College Child Protection Register;
- iv. Seek the views of the child at issue in the disclosure but take no action to investigate the disclosure/allegation;
- v. Within 24 hours, always ensure that the disclosure along with any expressed view from the child concerned, is discussed with the Contact, Advice and Assessment Team (CAAS) – Children’s Social Services at West Berkshire Council, West Street House, West Street, Newbury RG14 1BD. Telephone 01635 503 090 or email: child@westberks.gov.uk within 24 hours if it is:
 - n.1 possible that a child or young person has suffered or may suffer **significant harm** (including significant harm caused by bullying);
 - n.2 possible a **criminal offence** involving a child/young person has taken place or may take place.

If recommended by Contact, Advice and Assessment Team (CAAS), where a pupil is resident outside the West Berkshire area, also discuss the case with the appropriate Children’s Social Service operating in the pupil’s home area. In circumstances where a pupil comes from a split family, it may be necessary to make referral to Social Services in more than one additional area;

Any initial contact made by telephone will be confirmed in writing, by e-mail, within 24 hours;

If there are immediate concerns about the child’s safety the police will be contacted by the DSL (Emergency 999, or Non-Emergency 101). EDT contact details for out of hours children’s services in West Berkshire are 01344 786 543

edt@bracknell.forest.gov.uk

- vi. Ensure that the names of both the child at risk and the possible abuser(s) are communicated to Contact, Advice and Assessment Team (CAAS) if known. If, however, the identity/ies of the possible abuser(s) is/are not specified in the initial disclosure, the DSL will not investigate further in search of fuller information. No

attempt will be made to guess the identity of the un-named abuser(s) and the DSL will be cautious about sharing any suppositions loosely based on information rendered (where suppositions are shared with CAAS she will take care to be explicit about the limited confidence supporting the given information).

Supply additionally the following information (Berkshire West LSP procedures as specified at <https://www.westberkslscb.org.uk/>):

1. The child's name (and any other names that the child is known by);
 2. Date of birth;
 3. Gender;
 4. Family address (current and previous);
 5. Home telephone number;
 6. Child's current location and emotional/physical condition;
 7. Names of those with Parental Responsibility;
 8. Names and ages of siblings (if known) and names of other household members (including any known regular visitors to the household);
 9. GP's name;
 10. Ethnicity and religion of parents/carers;
 11. The nature of the alleged abuse at issue (i.e. physical, emotional, sexual or neglect);
 12. Indication whether the child needs immediate protection;
 13. Details of the allegation, including source of the allegations, timing/location of the alleged incidents along with the notes of the pupil's disclosure of abuse;
 14. Reference to previous referrals made by Bradfield College to children's Social Services;
 15. Background information relevant to the referral;
 16. Whether the parents' consent to the referral has been given. (If it has not been given, the DSL will explain why the College has decided to dispense with their consent);
 17. Whether the parents have been informed that the referral has been made. (If they have not, the DSL will explain why the College has decided not to inform parents);
 18. The name of the person who initially received the disclosure;
 19. The names of any people at Bradfield College or CAAS that the DSL has contacted to discuss this matter.
- vii.** Contact the Contact, Advice and Assessment Team (CAAS) – Children's Social Service again if no acknowledgement is received within 24 hours;
- viii.** Discuss whether it is appropriate that the parents of the child involved should be informed that a referral is being made to the Contact, Advice and Assessment Team (CAAS). If it seems possible that informing parents could place the child at greater risk of harm or impede a criminal investigation, she will ensure that CAAS are informed that the College has reservations about immediately informing the parents of the referral;

The DSL's involvement in considering what is alleged will cease with a referral to CAAS. All discussion of the allegation by employees of Bradfield College is forbidden from this point.

The DSL will ensure that neither College employees, nor members of Council will interfere with evidence (for example by attempting to interview the child or his/her parents).

6. Allegation of Abuse by a Member of College Staff: Initial Response

Allegations about abuse by members of the Bradfield staff (employees or volunteers) will in **every** case be dealt with by the Headmaster. Members of staff or others who suspect (or know of) abuse of a child by a College employee, contractor or volunteer should not raise this matter with the DSL but take it directly to the Headmaster.

If the Allegation is made about the Headmaster then the member of staff must contact the Warden (sophia@quintadelarosa.com) or the Deputy Warden (majonespty@gmail.com) They will then follow the same process below:

- i. The Headmaster or Warden will:
 - i.1 discuss with the Contact, Advice and Assessment Team (CAAS), number **01635 503 090**, child@westberks.gov.uk within one working day, all allegations of abuse made against individuals who are employees of the College or volunteers working at Bradfield unless they are so serious that immediate contact with Thames Valley Police (**101** in non-emergency cases) is necessary;
 - i.2 where the allegation relates to physical contact with a pupil, the College's Policy on Restraint (found in the *College Behaviour Policy*) will be considered as part of the discussion;
 - i.3 in "borderline" cases where it is not clear that what is alleged would constitute actual or potential *harm* the Headmaster will initially discuss the issue with the LADO (01635 503 090) on a "no names" basis;
 - i.4 make written notes of the discussion with the LADO. These notes will be signed and dated by the Headmaster.
- ii. Where, following discussion with the LADO, it seems probable that the member of staff discussed is guilty of **inappropriate behaviour** - but not behaviour that constitutes significant harm or criminal activity - the Headmaster will take matters forward using the College's staff disciplinary procedures. (If, during these disciplinary procedures, further evidence comes to light indicating that the allegation should be referred back to the LADO, internal disciplinary procedures will be halted immediately).
- iii. Where, following discussion with the LADO, it seems possible that the member of staff discussed may have caused a child **significant harm** or have committed a **criminal offence**, the Headmaster will:
 - iii.1 ensure the case is *formally* referred to the LADO within 24 hours;

iii.2 take the role of “case manager” in the ensuing investigation (in the absence of the Headmaster, the Warden will take the role of “case manager”, as she also will do in circumstances where the Headmaster is the subject of the allegation).

7. Allegation of Abuse by a Member of Staff: Investigation

- i.** The case manager will:
 - i.1* Avoid all unnecessary delays in undertaking and completing the required investigation;
 - i.2* Confirm the formal referral to the LADO in writing, by e-mail, within 24 hours;
 - i.3* Promptly inform the employee/volunteer of the allegation and forthcoming investigation (unless the need to hold a strategy discussion with police or other agencies necessitates a brief delay in this);
 - i.4* Consider suspending the employee or volunteer (KCSIE (2019) dictates that all options to avoid suspension should be considered before the step is finally taken. The views of the LADO must be given due weight in reaching a decision);
 - i.5* Decide to suspend an employee or volunteer if:
 - i.5.1* their continuing presence in the College places a child (or children) at risk;
 - i.5.2* the allegation of abuse is so serious that dismissal for gross misconduct is possible;
 - i.5.3* their continuing presence in the College seems likely to impede the further investigation of the allegations by the Contact, Advice and Assessment Team (CAAS);
 - i.6* Appoint, in consultation with the LADO an “investigating officer” to gather evidence relating to the allegation against the employee;
 - i.7* Appoint a named representative from the SMT to keep the employee informed of the progress of the case;
 - i.8* Inform the parents of the child(ren) involved, making them aware of the prohibition on reporting or publishing allegations about a teacher (§ Section 141 F of the Education Act 2011) and make arrangements to keep them informed about the progress of the investigation;
 - i.9* Take advice from the LADO, the Police and Contact, Advice and Assessment Team (CAAS) to determine:
 - i.10* the information to be shared and with whom it can be shared;
 - i.11* how to manage speculation, leaks and gossip;
 - i.12* information that might reasonably be given to the wider community to reduce speculation;
 - i.13* how any press interest is to be managed, should it arise.
- ii.** In cases where an employee or volunteer is suspended during an investigation, the Headmaster will:
 - ii.1* Recognise that suspension of an employee /volunteer in such circumstance must not be construed as a disciplinary penalty. (In consequence a suspended member of staff will be in receipt of full pay and benefits. Voluntary alternatives to suspension - e.g. paid leave of absence - may be considered by the Headmaster.)

- ii.2 Consider placing a suspended employee normally resident in College accommodation in temporary accommodation off-site (provided at the College's expense);
 - ii.3 Interview the employee/volunteer. An employee will be entitled to bring a trade union representative (or a friend) to the interview. At the interview, the employee or volunteer will be informed of the allegation laid against them and provided with all possible information not prejudicial to the conduct of the investigation;
 - ii.4 Send the suspended employee/volunteer written notification of the reasons for suspension within 24 hours of the oral interview. In this written notification the employee/volunteer will be provided with the name of a member of the SMT who will act as an information channel, keeping them abreast of the progress of the investigation;
 - ii.5 Inform the Warden and Council of the suspension;
 - ii.6 Inform the pupil who has made an allegation (and his/her parents) that the accused employee/ volunteer has been suspended.
- iii. In cases where an employee or volunteer is not suspended, the Headmaster will:
- iii.1 Interview the employee/ volunteer, informing him/her of subsequent actions to be taken by the College and/or Contact, Advice and Assessment Team (CAAS). The Headmaster will discuss whether the employee or volunteer has any wish to receive support or counselling during the investigation. An employee or volunteer will be entitled to bring a trade union representative (or a friend) to the interview.

8. Allegation of Abuse: Concluding an Investigation

i. Allegation Substantiated

The Headmaster will:

- i.1 institute appropriate action within 3 working days, unless a formal disciplinary hearing is required;
- i.2 convene any formal disciplinary hearing within 15 working days in cases where the allegation does not involve a possible criminal offence but requires an internal hearing;
- i.3 promptly discuss with the LADO the possibility of referring the employee/volunteer to the DBS to consider including them on the **barred list**;
- i.4 promptly discuss with the LADO the possibility of referring any employee/volunteer who is a teacher to the Teaching Regulation Agency (TRA) to consider prohibiting the individual from teaching as a result of “unacceptable professional conduct”, “conduct that may bring the profession into disrepute”, or “conviction for a relevant offence”.

The LADO will review the circumstances of the case with the Headmaster to determine if any improvements might be made in Bradfield's CP procedures/practices.

ii **Allegation Unsubstantiated**

The Headmaster will:

- ii.1* make a comprehensive summary of the allegation, subsequent investigation and decisions reached and place it on the personnel file of the teacher/volunteer;
- ii.2* provide the teacher/volunteer with a copy of the information placed on their personnel file;
- ii.3* retain the record on file for 10 years or (if it comes sooner) up to the point where the teacher/volunteer reaches normal retirement age;
- ii.4* not refer to the allegation on any employer reference even if the unsubstantiated allegation is one of a sequence of repeated unsubstantiated allegations.

iii. **Allegation found to be False**

The Headmaster will:

- iii.1* make a comprehensive summary of the allegation, subsequent investigation and decisions reached and place it on the personnel file of the employee/volunteer;
- iii.2* provide the employee/volunteer with a copy of the information placed on their personnel file; *iii.3* retain the record on file for 10 years or (if it comes sooner) up to the point where the employee/volunteer reaches normal retirement age;
- iii.4* not refer to the allegation on any employer reference even if the unsubstantiated allegation is one of a sequence of repeated false or unsubstantiated allegations.

iv. **Allegation found to be Malicious**

The Headmaster will: *iv.1* remove details of the allegation from the employee/volunteer's personnel record; *iv.2* offer active support (e.g. from the College counselling service) to the employee/volunteer who was the subject of the malicious allegation;

- iv.3* not refer to the allegation on any employer reference;
- iv.4* consider referring the matter to the Police or else follow the College's Behaviour Policy in determining the disciplinary sanction to be imposed on the pupil(s) making the malicious allegation.

The LADO will refer the matter to the Contact, Advice and Assessment Team (CAAS) – Children's Social Services to determine whether any child who made the allegation is in need of Children's Services' help.

v. **Allegation judged Unfounded**

The Headmaster will:

- v.1* make a comprehensive summary of the allegation, subsequent investigation and decisions reached and place it on the personnel file of the employee/volunteer;
- v.2* provide the employee/volunteer with a copy of the information placed on their personnel file;

- n.3* retain the record on file for 10 years or (if it comes sooner) up to the point where the employee/volunteer reaches normal retirement age;
- n.4* not refer to the allegation on any employer reference even if the unsubstantiated allegation is one of a sequence of repeated false or unsubstantiated allegations.

vi. **Exit Arrangements**

The Headmaster will:

- vi.1* continue with any investigation into an allegation of abuse if the employee/volunteer who is the subject of the allegation refuses to cooperate with the investigation
- vi.2* continue with any investigation into an allegation of abuse even if the employee/volunteer who is the subject of the allegation resigns or ceases to be used by the College (whether as a result of resignation, dismissal, non-renewal of contract or ending their use as a supply worker);
- vi.3* not countenance the use of any “compromise agreement” as a means of avoiding the investigation.

9. The Prevent Strategy & Safeguarding

The school values freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society’s values. Both pupils and teachers have the right to speak freely and voice their opinions. However, free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

The school follows statutory guidance in its efforts to protect children and young people against the messages of violent extremism and all staff are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology.

Staff will be made aware at safeguarding training of the guidance offered in the Revised Prevent Guidance for England and Wales (2015) and will be alerted to characteristics within children and families that may indicate radicalisation or warning indicators of those who may be vulnerable to radicalisation.

Staff will treat any radicalisation/extremism concerns in the same manner as safeguarding concerns and will follow the College’s safeguarding and child protection procedures as outlined in the blue card.

10. Key Personnel and Agencies

The College governing body, the Council, acknowledges that safeguarding duties are the responsibility of the entire governing board. A sub-committee of Council, the **Pastoral Committee** monitors the effectiveness of the College’s discharge of its Child Protection responsibilities and arrangements. Additionally, a member of Council is nominated as the **Governor** responsible for Child Protection; currently this is Catherine Hartz. However, a full review of policy and the past year’s safeguarding activity will be undertaken by the

full board at the Summer Council Meeting and the DSL will attend that meeting to answer questions put by governors.

The College will ensure that both the DSL and her Deputies receive appropriate biennial training, that they are supported in their roles and have sufficient funding and time to fulfil their responsibilities. The DSL will ensure written records are maintained of any concerns about children, even when there is no evident need to refer the matter immediately. She will ensure these records are kept securely and are separate from pupils' files in houses.

The DSL will develop effective links with relevant agencies for child protection and co-operate as required with any enquiries regarding child protection matters. She will refer any suspicions of child abuse to the relevant agencies in accordance with agreed national and local guidelines.

The management of safer recruitment' is the responsibility of the College **HR Manager** who will also maintain the Single Central Register of Appointments. Safer recruitment procedures and the Central Register is monitored by the **Director of Compliance**.

11. Key Responsibilities

All adults working with or on behalf of children have a responsibility to protect them. There are, however, key people within Bradfield who have specific responsibilities under our safeguarding and child protection procedures.

The Council: The Council has a duty to ensure that up-to-date and effective Safeguarding and Child Protection Procedures are in place at Bradfield and that arrangements are in place to ensure that are correctly followed by all employees, volunteers and contractors' employees.

The specific responsibilities of Council laid down in KCSIE (2019) are these:

- to ensure there is an effective Safeguarding and Child Protection Policy in place at Bradfield and that it includes a Staff Code of Conduct;
- to ensure that, as part of their induction programme, all employees (both permanent and temporary) and volunteers working at the College are provided with the Safeguarding and Child Protection Policy, Staff Code of Conduct, Whistleblowing Policy and Bradfield College Child Protection blue card with DSL details;
- to ensure that the College's Safeguarding and Child Protection Policy accords with government guidance and takes account of the local inter-agency procedures;
- to ensure that the College's safeguarding arrangements take into account the requirements of the West Berkshire Contact, Advice and Assessment Team (CAAS);
- to ensure that the College's Safeguarding and Child Protection Policy is updated annually and made available publicly on the Bradfield website;
- to ensure that a member of the Senior Management team is designated as the College's safeguarding lead and that this responsibility is made explicit in the role- holder's job description;
- to ensure that there are procedures in place to deal with Child Protection allegations against a member of staff or volunteer and to nominate a member of Council to liaise

with the local authority and/or partner agencies in the event of an allegation of abuse being made against the Headmaster;

- to ensure that all Child Protection allegations against a member of staff or volunteer are discussed with the Contact, Advice and Assessment Team (CAAS) – Children’s Social Services;
- to ensure there are procedures in place for the College to make a referral to the Disclosure and Barring service (DBS) if an employee, volunteer or contractor’s employee is dismissed because of safeguarding concerns (or would have been dismissed if they had not resigned); to ensure there are procedures in place at Bradfield to deal with allegations of abuse made against other children;
- to ensure that there are procedures in place at the College to deal with children who go missing from school and that these procedures take note of and act upon repeated unexplained absences;
- to ensure that individuals who pose a risk of harm to children are prevented from working at Bradfield (as employees, volunteers or contractors’ employees) by recruitment procedures that fulfil the statutory responsibility for Safe Recruitment and any additional, proportionate measures deemed necessary to secure the safety of the College’s children;
- to ensure that at least one person on any appointment panel has undertaken safer recruitment training;
- to ensure that there is a written policy outlining the College’s recruitment and selection processes which details procedures in place to achieve safe recruitment;
- to ensure that there are procedures in place for children to express their views and to offer feedback to the College;
- to ensure that employees, volunteers and contractors’ employees understand that they should always act in the interests of the child in safeguarding matters and that they cannot offer confidentiality to a child in any circumstances;
- to consider how children may be taught about safeguarding (including online safeguarding) within the classroom as part of a broad and balanced curriculum and how pupils may develop the personality and confidence to keep themselves safe from potential and actual abuse through a range of Co-Curricular opportunities;
- to ensure that the College contributes to inter-agency working in line with the guidance given in *Working Together to Safeguard Children (2018)*; to ensure that the Contact, Advice and Assessment Team (CAAS) – Children’s Social Services is supplied such information as it requires to perform its statutory functions;
- to ensure that the Contact, Advice and Assessment Team (CAAS) – Children’s Social Services (and Children’s Services from individual pupils’ home areas) are allowed access to the College when they request it;

The College Pastoral Committee and the nominated Governor for Child Protection will satisfy themselves that the College’s Child Protection and Safeguarding arrangements are current, accord with the requirements of the Law and represent good standards of practice. They will undertake termly reviews of safeguarding at Bradfield.

Annually, the Council will discuss, review and endorse the College’s updated Safeguarding and Child Protection Policy and the DSL’s annual report on the working of the policy. Minor

changes in this policy made in the course of the academic year will be ratified by the Warden and these changes will be reported to the full Council at the time of the Policy's annual review.

The Headmaster: The Headmaster has a duty to ensure that the importance of procedures to ensure the proper protection of children at Bradfield College is emphasised to all employees, volunteers and contractors' employees and that the procedures are followed by all staff.

He will:

- appoint a Designated Safeguarding Lead to co-ordinate action within the College and liaise with other agencies on suspected abuse cases;
- understand the role of the Designated Safeguarding Lead (and Deputies) and ensure that they have the time, funding, training, resources and support to discharge their responsibilities and provide advice and support to other staff on child welfare and child protection matters;
- ensure that matters of Safeguarding and Child Protection are regularly discussed by the Designated Safeguarding Lead and the Senior Management Team;
- ensure that the College's Safeguarding and Child Protection Policy is brought to the attention of pupils and their parents;
- arrange for a termly report on Child Protection to be given to Council and for an annual discussion of safeguarding between the full governing body and the Designated Safeguarding Lead.
- in circumstances where an allegation of child abuse is made against a member of staff (or a volunteer), be the person to whom members of the College Staff refer the matter. He will discuss the allegation with the West Berkshire Designated Officer (LADO) and inform the Designated Safeguarding Lead of his action (unless the Designated Safeguarding Lead is the subject of the allegation);

- make a report to the DBS if any employee, volunteer or contract worker resigns, withdraws from voluntary activity or ceases to be engaged by the College because he/she is considered unsuitable to work with children. Such a report will also be made in circumstances where an employee considered unsuitable to work with children leaves Bradfield's employment at the end of a fixed-term contract. He will make the required report within one month of the employee, volunteer or contract worker leaving the school and make it in all circumstances: if employment is terminated; if a contract of employment is not renewed; if the employee or volunteer resigns; or if voluntary arrangements are discontinued. No exceptions will be made.
'Compromise agreements' will not apply in this connection;
- ensure that if a teacher resigns or is dismissed as a result of "unacceptable professional conduct" or "conduct that may bring the (teaching) profession into disrepute" or in consequence of "conviction, at any time, for a relevant offence", a report is made to the Teachers' Referral Agency.
- ensure IT systems are robust to establishes mechanisms to identify, intervene in and escalate any incident where appropriate, these being exposure to illegal, inappropriate or harmful material; being subjected to harmful online interaction with other users; and personal online behaviour that increases the likelihood of, or causes, harm.

The Designated Safeguarding Lead: The Designated Safeguarding Lead has an operational duty to act as the lead person in matters of Child Protection and Safeguarding and a managerial responsibility to ensure there is adherence to national, local and College procedures designed to ensure the proper protection of children at Bradfield College.

In her operational capacity, the Designated Safeguarding Lead will:

Manage referrals

- 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.

Work with others

- 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);
- liaise with staff on matters of safety and safeguarding (including on-line safeguarding) when deciding whether to make a referral by liaising with relevant agencies;

- liaise with the College's e-safety lead to ensure that good standards of safeguarding are maintained in the management and supervision of pupils' on-line activities; be alert to the specific needs of children in need, those with special educational needs and young carers;
- keep detailed, accurate, secure written records of concerns and referrals; • act as a source of support, advice and expertise for staff.

Provide training

- ensure training requirements are fulfilled and undergo training to provide her with the knowledge and skills required to carry out the role. This training will be updated at least every two years.
- undertake Prevent awareness training.
- in addition to formal training, the DSL's knowledge and skills will be refreshed (via e-bulletins, meeting other designated safeguarding leads, and by reading and digesting safeguarding developments) at regular intervals, but at least annually.
- 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 the Berkshire West LSP conducts 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 or college's Safeguarding and Child Protection Policy and procedures, especially new and part time staff;
- ensure all staff receive regular updates in line with Berkshire West LSP advice on Safeguarding and on-line safety;
- ensure each member of staff understands and supports the College with regards to the requirements of the Prevent duty, and provides on-going advice and support to staff on protecting children from the risk of radicalisation;
- ensure all staff obtain access to needed resources and attend any relevant or refresher training courses;
- model a culture of listening to children, and taking account of their wishes and feelings, to all staff.

Raise Awareness

- ensure the College's Safeguarding and Child Protection policies are known, understood and used appropriately;
- ensure the College's Safeguarding and Child Protection Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with Council regarding this;
- ensure the Safeguarding and Child Protection Policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the College in this; and

- link with the Contact, Advice and Assessment Team (CAAS) – Children’s Social Services to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

Be available

- during term time the designated safeguarding lead (or a deputy) will always be available for staff in the College to discuss any safeguarding concerns.
- arrange adequate and appropriate cover arrangements for any out of term activities.
- hold copies of key Child Protection documents;

In her managerial capacity, she will make arrangements to ensure that:

- a Safeguarding and Child Protection Policy is made available to all staff, volunteers and contractors’ employees and takes account of current legislation, national and local guidance;
- a Staff Code of Conduct is prepared and made available to all staff, volunteers and contractors’ employees;
- a College policy and protocols are drafted detailing responses to the unaccounted absence from school of a pupil;
- the Safeguarding and Child Protection Policy, Code of Conduct and Missing Pupil protocols are read and understood by staff, volunteers and contractors’ employees;
- staff, volunteers and contractors’ employees know the names of the DSL & her Deputies, and understand their roles;
- all staff, volunteers and contractors’ employees receive annual training in the College’s Safeguarding and Child Protection procedures (including Radicalisation and the Channel process as recommended by West Berkshire Education Officer), to include the above;
- all staff, volunteers and contractors’ employees understand their safeguarding duty is to promote the welfare of any child perceived to be in need of additional support and not only to deal with instances of actual or potential child abuse;
- every member of staff, volunteer or contractor’s employee understands their duty to be responsive to children who approach them seeking an opportunity to disclose that they (or some other pupil) have been harmed or are at risk of harm.
- all staff, volunteers and contractors’ employees understand their responsibility to refer any concerns that a child has been harmed, or is at risk of harm, to the DSL;
- every Housemaster, Housemistress, Matron and House Tutor understands it is central to the pastoral role of those who work in boarding to exercise extreme vigilance in respect of signs of possible child abuse—both actual and potential—and to know their Safeguarding duties to those at risk of harm (including harm on-line) and to know what they must do if they develop concerns;
- every Housemaster and Housemistress understands it is central to their role to regularly to explicitly and formally remind members of their respective house teams of their significant safeguarding duties;
- all school and house prefects and other children in positions of responsibility understand it is central to their role to exercise vigilance in respect of signs of possible

child abuse, that they clearly understand the appropriate action to take should they receive any allegations of actual or potential abuse and that they have a clear responsibility to refer any concerns that a child has been harmed, or is at risk of harm (including harm on-line); recruitment procedures that fulfil the statutory responsibility for Safe Recruitment (and any additional, proportionate measures deemed necessary to secure the safety of the College's children) are in place to guard against individuals who pose a risk of harm to children gaining work at Bradfield (whether as employees, volunteers or contractors' employees);

- the written policy outlining the College's recruitment and selection processes accurately reflects appointment practices at the College and contains sufficient safeguards to guard against individuals who pose a risk of harm to children gaining work at Bradfield;
- the College HR Department is supported in understanding the requirements for the Single Central Record of Appointment and that the Record is subject to routine scrutiny to ensure there is proper compliance with Legislation and Guidance;
- that appropriate Safeguarding Children checks are undertaken when pupils work with employees of other organisations, either at Bradfield or on off-site activities;
- when members of the Staff are issued with school mobile telephones or other devices equipped with a camera, these employees are explicitly reminded that "using images of children without written, age-appropriate consent is illegal and constitutes gross misconduct";
- parents have an understanding of the responsibility for Safeguarding and Child Protection placed upon the College, its staff/volunteers and contractors' staff, and know that this policy is published on the College website and referenced in the Parents' Handbook;
- pupils are made aware of Safeguarding and Child Protection matters, for example through discussion in Wellbeing classes and through advice given in the Pupils' Handbook, and that, through a range of Co-Curricular opportunities, they have opportunity to develop the personality and confidence to keep themselves safe from potential and actual abuse (including abuse on line). There is curricular and pastoral provision to ensure that children understand how to keep themselves safe – including how to keep safe on- line.
- Pupils who are victims of abuse (including victims of on-line abuse like "sexting" or "up-skirting" receive appropriate support and any necessary professional assistance (such as counselling)

Housemasters and Housemistresses: Housemasters and Housemistresses will be responsible for:

- putting into practice, within their Houses, methods for encouraging pupils to tell someone if they are being abused physically, emotionally, sexually or by neglect (in line with the College's Safeguarding Mission Statement – page 3 above);
- checking that the matron and tutors in their house are alert to the signs of possible child abuse and know what they have to do if they have any suspicions;
- checking that the matron and tutors in their Houses read and are familiar with the

College's Safeguarding and Child Protection Policy and the Required Working Practices for Staff, and understand that these policy documents must always be followed assiduously;

- are aware of their statutory obligations under the Prevent duty;
- regularly reminding the matron and tutors in their houses of the Confidentiality Policy and that specifically confidentiality can never be promised to a pupil making a disclosure about personal abuse or giving evidence of abuse of another pupil;
- reminding the matron and tutors of the College's e-safety policy and associated arrangements, ensuring that they understand the requirements of these protocols in respect of their day-to-day care of pupils;
- reminding the matron and tutors of the College policy on pupils missing from school, ensuring that they understand how to apply to protocols during an emergency;
- drawing the attention of the matron and tutors to the guidance in this policy on: Self-Harm; Eating Disorders; Promoting Mental Health; Pupils with Depression; Pupil potentially at risk of Suicide; the Prevent duty.
- drawing the attention of parents to the College Policy on Parents' Visiting Boarding Houses given in the Parents' Handbook.
- If at any time it is considered that the child may be a child in need as defined in the Children Act 1989, or that the child has suffered significant harm or is likely to do so, a referral should be made immediately to local authority children's social care. This referral can be made by any professional.

Teaching Staff and Matrons: All teaching staff and Matrons will:

- know and adhere to the College's Safeguarding and Child Protection Policy the Required Working Practices for Staff;
- raise without delay any safeguarding concerns they might have about a child, with the DSL (or her Deputies) - children not suffering actual harm or at immediate risk may still stand in need of additional support;
- are aware of their statutory obligations under the Prevent duty;
- ensure that any allegations of actual or potential abuse by an employee, volunteer or a peer pupil is passed to the Headmaster without delay - on the day when concerns or suspicions develop;
- deal with suspected or actual abuse according to the policy: they will be mindful of the College Policy on Confidentiality while doing so;
- be aware of the College Whistleblowing Policy [found in HR Policies – follow the link under Teacher Resources on the intranet];
- as part of their Risk Assessment duties relating to any off-site activities they organise, ensure that appropriate child protection checks and procedures apply to any staff who will be working with Bradfield pupils (e.g. at a Field Study Centre) but who are employed by another agency and are not Bradfield College employees;
- if issued with a College device equipped with a camera, use it on the understanding that that it is made available by the College on the assumption they are clear that "using

images of children without written, age-appropriate consent is illegal and constitutes gross misconduct’.

The Chief Operating Officer (COO) will be responsible for ensuring that:

- the College’s support staff are alert to the signs of possible abuse and know what they have to do if they have any suspicions; they are aware of their statutory obligations under the Prevent duty
- the HR Department is properly trained in the requirements of safer recruitment and sufficiently resourced to fulfil these responsibilities in respect of all employees, volunteers, contractors’ employees and spouses/adult children of employee’s resident in boarding accommodation.

Support Staff: All support staff will:

- know the procedure they must follow if they become alert to suspected or actual child abuse;
- raise without delay any safeguarding concerns they might have about a child, with one of the Designated Safeguarding Leads - children not suffering actual harm or at immediate risk may still stand in need of additional support;
- be aware of their statutory obligations under the Prevent duty.
- ensure that any allegations of actual or potential abuse by an employee or volunteer or peer-pupil is passed to the Headmaster without delay - on the day when concerns or suspicions develop;
- be aware of the College Whistleblowing Policy (found in Human Resources on Firefly) and of the College Confidentiality policy;
- if issued with a College device equipped with a camera, use it on the understanding that that it is made available by the College on the assumption they are clear that “using images of children without written, age-appropriate consent is illegal and constitutes gross misconduct”.

Pupils: All pupils should:

- be aware of the College’s Safeguarding Mission Statement (section 8 above);
- inform a trusted person within the College if they are being abused physically, emotionally, sexually, or by neglect, if they fear such abuse or if they are aware of some other pupil who is experiencing actual or potential abuse;
- understand that pupils can abuse other pupils and not view things like “banter” and “sexting” as anything less than they actually are – potential or actual child abuse;
- reject the idea that disclosing abuse of any form is “dobbing in”;
- be aware of the College’s e-safety arrangements, conduct themselves accordingly on-line and inform a trusted person within the College if they are subject to any measure of on-line abuse (or threat of abuse) or if they learn that some fellow pupil is being threatened or abused on-line;
- be aware of the College’s security arrangements and its policy on Pupil Access to High Risk Areas of College.

Parents: All parents should:

- be aware of the College’s Safeguarding and Child Protection Policy and its Safeguarding Mission Statement);
- contact the DSL (or her Deputies) if they suspect that their son/daughter (or some other pupil at the College) has been, or is at risk of being harmed as a result of being abused physically, emotionally, sexually, by neglect, or as a victim of bullying, or if they have concerns about radicalisation;
- comply with the College Policy on Parents’ Visiting Boarding Houses.

12. Relationships between Pupils and Staff

i. Pupil Conduct

Pupils are expected to observe appropriate boundaries in their dealings with all employees and volunteers.

They are also expected to treat one another with courtesy and respect. Pupils who do not fulfil the College’s expectations of pupil behaviour (set out in the College *Behaviour Policy -- on the College website*), whether in the physical world or on-line, face clear sanctions; the arrangements for Pastoral Care at the College are intended to support children towards a proper understanding of what is appropriate in relationships and to give warning of the consequences of their falling short in a significant manner.

Pupils who bully others, either physically or on-line face clear sanctions set out in the *Anti-Bullying Policy (on the College website)* and pastoral arrangements at the College are intended to support children towards a proper response to being bullied or to witnessing bullying actions. Pupils are clearly warned of the serious consequences which will follow their being found involved in any sort of bullying including verbal bullying they might wish to describe as “banter”, and on-line bullying like “sexting”

Bullying which results in significant harm, or which threatens significant harm constitutes the abuse of a child by another – see below. In such circumstances, the College’s disciplinary response will involve expeditious consultation with the Contact, Advice and Assessment Team (CAAS).

ii. Peer-on-Peer Abuse

Staff are expected to recognise that children are capable of abusing their peers. Such abuse can take a number of forms such as:

- physical abuse (things like hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm);
- initiation/hazing rituals;
- sexting (also known as youth produced sexual imagery) in which young people make sexualised pictures of themselves and send them to one another (often to “flirt” or develop a relationship) – the intention in sexting does not have to be malicious;
- actual sexual violence and sexual harassment.

Behaviour of this form is never acceptable: school or house “tradition” must never weaken opposition to initiation practices; sexting is absolutely unacceptable even when it is done naively or out of misplaced affection. Peer conduct presented as “banter”, “just having a laugh” or as “part of growing up” is wholly unacceptable if it causes harm or distress.

Staff are also expected to be mindful that peer-on-peer abuse is frequently gendered (it is more likely that girls will be victims and boys perpetrators); however this is not universally the case and other social inequalities (such as age, “cool”/“uncool”) can be exploited by children who abuse their peers.

The School actively seeks to raise awareness of and prevent all forms of peer-on-peer abuse by educating all Governors, Senior Leadership Team, staff and volunteers, pupils and parents about this issue. This includes:

- training all Governors, Senior Leadership Team, staff and volunteers on the nature, prevalence and effect of peer-on-peer abuse, and how to prevent, identify and respond to it. This includes:
 - (a) Contextual Safeguarding;
 - (b) the identification and classification of specific behaviours;
 - (c) the importance of taking seriously all forms of peer-on-peer abuse (no matter how low level they may appear) and ensuring that no form of peer-on-peer abuse is ever dismissed as horseplay or teasing.

Training includes case studies which the staff design themselves;

- educating children about the nature and prevalence of peer-on-peer abuse via Wellbeing lessons and the wider curriculum. Pupils are frequently told what to do if they witness or experience such abuse, the effect that it can have on those who experience it and the possible reasons for it, including vulnerability of those who inflict such abuse. They are regularly informed about the College’s approach to such issues, including its zero tolerance policy towards all forms of peer-on-peer abuse;
- engaging parents on this issue by talking about it with parents, both in groups, parent lectures and one to one;
- ensuring that all peer-on-peer abuse issues are fed back to the College’s safeguarding lead so that they can spot and address any concerning trends and identify pupils who may be in need of additional support;
- challenging the attitudes that underlie such abuse (both inside and outside the classroom); working with Governors, Senior Leadership Team, all staff and volunteers, pupils and parents to address equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the College community;
- creating conditions in which our pupils can aspire to and realise safe and healthy relationships;
- creating a culture in which our pupils feel able to share their concerns openly, in a non-judgmental environment, and have them listened to;
- responding to cases of peer-on-peer abuse promptly and appropriately.

Allegations of and responses to peer-on-peer abuse will follow the procedures set out in Section 4 of this policy.

iii. Victim and Perpetrator Support

Both victim and perpetrator will be supported within Bradfield College as needed. This may include time out in the Med Centre, seeing Counsellors or support through the Doctor referral to CBT or psychological assessment, as required in each individual case.

iv. Child-on-Child sexual violence and sexual harassment

Staff are expected to be aware of the fact children can, and sometimes do, commit acts of sexual violence and abuse their peers in this way and will be trained in how to manage any suspicion or report of child-on-child sexual violence or harassment. Such offences include: the intentional and non-consensual sexual touching of another person (a sexual assault) and intentional and non-consensual penetration of the vagina, anus or mouth of another person (rape). Up-skirting (where a sexually intrusive photograph is secretly taken with the intention of viewing the genitals or buttocks of a form of sexual harassment punishable by up to two years in jail.

Non-consensual acts take place when a child does not have the freedom and capacity to **choose**. The Law is clear that a child under 16 cannot give consent to sexual activity so any

sexual activity involving a child below the “age of consent” is *prima facie* an act of child-on-child sexual violence and any employee or volunteer aware of such activity will discuss this with the DSL.

A child cannot consent to something he/she does not understand, and an act is non-consensual if it is based upon emotional manipulation, insistence or physical force. This also means that, even if a child is over 16, if they do not **understand** what they are being invited to participate in, they are unable to consent to it. It is important to remember this when older children with limited intelligence or emotional understanding are engaged in sexual activity; a member of staff suspecting that such a child is engaged in activity which they do not fully understand must always discuss their concerns with the DSL.

Consent is also **specific**: it may be given to one sort of sexual activity but not to another (e.g. a child might consent to heavy petting but not intend participation in penetrative acts). Consent can be withdrawn at any time during sexual activity and, in a relationship, specific consent is required every time sexual activity occurs.

Unwanted conduct of a sexual nature constitutes sexual **harassment**. This can occur both online and offline. It almost always violates a child’s dignity, and makes them feel uncomfortable, intimidated or degraded; it creates a hostile, offensive or sexualised environment.

Allegations of and responses to sexual violence and harassment will follow the procedures set out in Section 5 of this policy.

v. Reasonable Force & the Restraint of a Pupil

There are circumstances when it is appropriate for staff to use reasonable force to safeguard pupils. College policy on Restraint is in the Behaviour Policy (Section C6).

vi. Abuse of a Position of Trust

The Sexual Offences (Amendment) Act 2003 creates an offence of “Abuse of Trust”. All staff employed at Bradfield College will recognise that they are in a ‘position of trust’ and make sure that they keep within the appropriate boundaries during their dealings with pupils under 18. The conduct of staff and the language they use in conversation with pupils under 18 will fall within appropriate boundaries.

Irrespective of the age of consent (and even if the basis for a relationship is consensual) it is illegal for a College employee in a “position of trust” to engage in any sexual activity with (or directed towards) a pupil under 18. This will be made clear to employees/volunteers as part of their Induction training in Child Protection.

It is important that any College employee who is concerned that actions (or words) might be construed as an abuse of a position of trust (or who is concerned that a pupil is working to move their relationship into an unacceptable area) should:

- Make a written note of the incident(s) that is/are the focus of their concern;
- Discuss the incident(s) with the Deputy Head (Pastoral) or his/her own Head of Department or supervisor (who should counter-sign the written notes);
- Keep the counter-signed notes on file in case of a future accusation of abuse of trust;
- Consider discussing the matter with their trade union.

This section of the Safeguarding and Child Protection Policy must be read in conjunction with *Required Working Practices for Staff*.

vii. Online and Social Media Activities

Bradfield College recognises much abuse happens over Internet and mobile 2G, 3G 4G (and soon to be 5G) networks and via Social Media. The College’s network filters internet access and there is monitoring of usage of the school system by the Deputy Head Pastoral’s Office. Any internet searches indicating Safeguarding matters may be at issue are followed up by the Deputy Head. Further, information on how to protect yourself online is provided to pupils through Wellbeing lessons and attention is given there to the challenges posed by 3G/4G technology and pupil access to internet sites without use of the monitored school system. HsMs and Matrons talk to pupils in house about on-line safety and the College limits pupils’ access to phones, tablets and laptops overnight at a level judged to be appropriate to their ages. There is a separate E-Safety Policy.

viii. Remote Teaching and other educational arrangements required in Emergency Circumstances

In circumstances where a pupil is forced by circumstances to be absent from the College site for protracted period, or in circumstances where the College’s operation on site is, either in part or wholly, suspended as a consequence of a national emergency (e.g. epidemic or pandemic infection), the College may offer home tuition and pastoral support to pupils using the telephone and on-line resources.

“Remote teaching” will primarily be facilitated by resources posted on the College system and the facility will include provision/delivery of content and posted assignments. Provision

of feedback on work submitted by pupils will be provided in a manner which seeks to replicate (so far as this is possible) the feedback provided by teachers when the College is working normally. This includes generic group feedback on work (which will be posted on Firefly) and specific feedback to individual pupils where a teacher deems this necessary (which will be provided by telephone or Skype/FaceTime exchanges where possible and appropriate).

“Remote pastoral care” will primarily entail telephone or email contact on a weekly basis (in scheduled term-time) aimed to replicate the one-to-one tutorial conversations each pupil has with a tutor when the College is in session. Further pastoral needs may be met by provision that is individually tailored to support a particular pupil. These further provisions will aim to replicate as far as possible the interventions initiated and managed by the Housemaster/mistress in the normal course of a pupil’s boarding education.

a) **Remote Pastoral Care: Weekly tutorials**

Provided by telephone or email and initiated by the pupil’s tutor, these weekly conversations (which should last around 15-20 minutes) will be provided in line with the following protocols.

- i. Parents will be informed that the provision is being made and the means by which it being delivered will be explained.
- ii. The telephone calls or emails will be made using a College telephone (either landline or a college-issued mobile) unless circumstances render this impossible (in which case the HsM will inform the parents and seek their agreement that the tutorial can take place on some other line; any alternative line agreed will be **the only alternative line** used by the pupil’s tutor).
- iii. The telephone calls will **in every case** be made to one of the parent(s) numbers listed on the College data management system (ISAMS). The tutee’s own mobile telephone cannot in any circumstances be used to receive tutorial support.
- iv. Notes will be kept by the tutor on the Tutor Dashboard on Firefly. In addition to noting the content of the tutorial the tutor will also record the time the call was made, the number called and the duration of the tutorial conversation. Weekly, a summary collation of all tutorial calls (time made/number used/duration of call) will be provided to the HsM by each member of the house tutor team.

b) **Remote Teaching**

The provision of individually tailored feedback will in the first instance be through a written medium (using Firefly or email), but may be made available through conversations by telephone or in exceptional circumstances *via* on-line face-to-face conversations with pupils, using Skype or FaceTime.

- i. Most commonly, one-to-one feedback will be provided by **telephone** and provided in accordance with these protocols:
 - a Parents will be informed that the provision is being made and the means by which it is being delivered will be explained in a letter or e-mail sent from the College;
 - b The telephone calls will be made using a College telephone (landline or college-issued mobile) unless circumstances render this impossible (in which case the HoD will inform the parents and seek their

- agreement that the feedback can be provided on some other line; any alternative line agreed will be **the only alternative line** used by the class teacher).
- c The telephone calls will **in every case** be made to one of the parent(s) numbers listed on the College data management system (ISAMS). The pupil's own mobile telephone cannot in any circumstances be used to receive teacher feedback.
 - d The teacher will record the time the call was made, the number called and the duration of the feedback conversation. Weekly, a summary collation of all feedback calls (time made/number used/duration of call) will be provided to the HoD by each member of the departmental team.
- ii. In certain circumstances telephone conversations will not provide a sufficient means of providing feedback (e.g. if a teacher needs to talk a pupil through a diagram or show them a worked solution). In these circumstances, feedback may be provided in a FaceTime or Skype conversation. There will be regular and careful vigilance, by the Heads of Department, and the pupil(s) parents to ensure that this opportunity is not exploited in any way.

The following Safeguarding protocols will be followed:

- 1) The class teacher will inform his/her Head of Department (HoD) that use of face-to-face tuition by Skype or FaceTime is in their judgement **necessary** if a particular pupil (or class) is to be effectively supported in the context of remote teaching.
 - a The teacher will outline in a written memo the reasons why the absence of such contact would compromise student(s) academic progress;
 - b The HoD will respond, agreeing to (or denying) the request and the response will be copied to the Deputy Head (Academic) who is one of the Deputy DSLs;
 - c The HoD's agreement will be filed in the Academic Office
 - d The HoD will e-mail the pupil(s) family(ies) to inform them of the planned teaching arrangement, seeking permission to proceed and offering an **explicit** opportunity for the family to refuse their permission for it to happen.
 - e The e-mail from the HoD will formally outline the conditions under which the on-line meetings must take place (4 below) and require the parents to agree in writing to operate according to these rules.
- 2) **Note:** *Where the teacher in question is a HoD, he/she will send the required memo (outlining the necessity of direct person-to-person work) to a peer HoD, and the peer HoD will be required to agree the request and inform the Deputy Head (Academic) before direct tuition can begin [as in i-iii, above]. The permission will be filed in the Academic Office and the peer HoD will write to the parents as required [as in iv & v, above].*
- 3) Once the agreement of a HoD and the pupil(s) parents have been received, the teacher will be free to begin direct, individual contact with the pupil(s) at home. Such contact will **in no circumstances** commence without the written agreement of the HoD and the parent(s).

- 4) In the course of the agreed person-to-person work (by telephone, Skype or FaceTime) the following Safeguarding arrangements will be kept in place:
- a The teacher will
 - Dress in a professional manner (as if present in the school classroom) for any Skype or FaceTime conversation;
 - Make a note of the date/time of each session's start and send a copy of his planned schedule to his HoD at the start of each day;
 - Make a summary note of the duration and content of each session and send a copy of his minutes to his HoD at the end of each day;
 - Not work one-to-one with a pupil when alone at home (or in a school department) – i.e. the rules requiring a second adult to be present when a pupil visits a teacher at their home in Bradfield will apply. (In circumstances where the school is closed and the teacher lives alone and no second adult can be present, the teacher will invite a colleague from Bradfield to join a three-party conference call with the pupil);
 - b The pupil(s) parents [as part of their agreement to allow face-to-face working on-line] will undertake to offer reasonable supervision of their child during the period of face-to-face work on-line.
 - c The parent(s) will be told that:
 - Their child will only be permitted to participate in on-line face-to-face tuition if they are dressed in an appropriate manner, and that the teacher will terminate the tuition arrangement immediately **and finally**, if this protocol is breached in any way;
 - The parents should ensure that their child engages on-line with the teacher from one of the family rooms at home (kitchen, sitting room etc.).
 - In exceptional circumstances, where work in a public space within the home does not constitute a reasonable arrangement, and the child has to engage on-line with the teacher from a private area (e.g. their bedroom at home) the parents will be formally advised that the College's unconditional and minimum expectation is that the on-line tuition will **in every case** take place: (a) with the door to the pupil's private area held fully open and (b) on the understanding that the parent(s) will occasionally look into the room, to ensure that the on-line work is proceeding in an appropriate manner;
 - If the supervision arrangements are evidently not fulfilled by the parents, the tuition arrangement will be terminated immediately by the teacher and finally by the College.

c) Remote Instrumental Instruction

Instrumental tuition (which is in most cases one-to-one tuition) may also be offered on-line, on receipt of a written request from parents, addressed to the Director of Music.

In fulfilling such a request, the College will follow these Safeguarding protocols:

- i. The Director of Music will confer with the pupil's instrumental teacher (to verify that the tuition will be practicable for the teacher and valuable

- to the student) and then respond to the parent, agreeing to the request, or asking for further discussion;
- ii. The response will be copied to the Director of Wellbeing who is one of the Deputy DSLs and the parental request will be filed in the Co-curricular Office along with the Director of Music's response
 - iii. The Director of Music will e-mail the pupil's family formally outlining the conditions under which the on-line meetings must take place and requiring the parents to agree in writing to operate according to these rules.
 - iv. In the course of the agreed person-to-person instrumental teaching (by telephone, or online) the following Safeguarding arrangements will be kept in place:
 - a. The teacher will
 - Dress in a professional manner (as if present in the school classroom) for any online conversation;
 - Make a note of the date/time scheduled for each lesson, and send a copy of his planned schedule (which may include other pupils at the College) to the Director of Music (including a summary note of the content of each lesson), at the end of each day;
 - Not work one-to-one with a pupil when alone at home (or in the College Music School) – i.e. the rules requiring a second adult to be present when a pupil visits a teacher at their home in Bradfield will apply. (In circumstances where the school is closed and the teacher lives alone and no second adult can be present, the teacher will invite a colleague from Bradfield to join a three-party conference call with the pupil);
 - b. The pupil(s) parents [as part of their agreement to allow face-to-face working on-line] will undertake to offer reasonable supervision of their child during the period of face-to-face work on-line.
 - c. The parent(s) will be told that:
 - Their child will only be permitted to participate in on-line face-to-face tuition if they are dressed in an appropriate manner, and that the teacher will terminate the tuition arrangement immediately *and finally*, if this protocol is breached in any way;
 - Where music tuition in a public space within the home does not constitute a reasonable arrangement, and the child has to engage on-line with the teacher from a private area (e.g. their bedroom at home) the parents will be formally advised that the College's unconditional and minimum expectation is that the on-line tuition will *in every case* take place: (a) with the door to the pupil's private area held fully open and (b) on the understanding that the parent(s) will occasionally look into the room, to ensure that the on-line work is proceeding in an appropriate manner;
 - If the supervision arrangements are evidently not fulfilled by the parents, the tuition arrangement will be terminated immediately by the teacher and finally by the College.

d) Remote Pastoral Support: Counselling

Established professional counselling (which is in normal operating circumstances routinely offered one-to-one, unsupervised at the College) may continue on-line, on receipt of a written request from a child's parents or from the professional counsellor. The request will be addressed to the Designated Safeguarding Lead. If made by the counsellor it need not name the pupil directly (XY of A/B House will be sufficient) but the request must contain a clear statement explaining why on-going support of the pupil is important).

In deciding to agree such a request, the College will require these Safeguarding protocols to be in place:

- i. The DSL will determine if the support requested will be practicable for the provider and valuable to the student and file the response
- ii. The DSL will formally outline the conditions under which the on-line meetings must take place writing to the counsellor (and to the pupil), explaining that both must agree *in writing* to operate according to these rules:
 - a. The counsellor will:
 - Dress in a professional manner (as if present in the school counselling room) for any Skype or Facetime conversation;
 - Make a note of the date/time scheduled for each session, and send a copy of his planned schedule to the Deputy Head (Pastoral) by the end of the day;
 - Not work one-to-one with a pupil when alone at home. The rules requiring a second person to be present in the home when a pupil visits a teacher at home in Bradfield will apply. (In circumstances where the counsellor providing pastoral support lives alone and no second person can be present in the home during the counselling session, *the support will not available unless the explicit permission of the pupil's parent is provided*);
 - b. The child will:
 - only be permitted to participate in on-line face-to-face pastoral conversation if dressed in an appropriate manner, and the counsellor will terminate the support arrangement immediately and finally, if this protocol is breached in any way;
 - be required to formally confirm at the start of any session that they are not alone in the home, and the counsellor will formally record that this affirmation has been made.
 - If any of these arrangements are evidently not fulfilled by the pupil, the counselling support will be terminated immediately by the counsellor.

13. The Ethos supporting Child Protection

There are four strands in the College's overall ethos which support Child Protection and Safeguarding:

- (a) The creation of an environment offering a quality pastoral care to pupils that safeguards and promotes pupils' welfare, including the provision of a strong programme of Personal, Social and Health Education that (among other things) helps children to understand what constitutes acceptable behaviour and empowers them to speak out when not treated properly;
 - (b) Staff recruitment practices that contribute to the creation of a safe environment for children;
 - (c) Regular and thorough training of all College staff, enabling them to discharge to good effect their responsibility to identify children suffering harm and take appropriate action when a pupil exhibits signs, or discloses things, indicative of abuse;
 - (d) Annual review by Governors of this policy and associated procedures.
- (a) The College's *Statement of Boarding Principles (on the College website)* gives emphasis to the importance accorded **high quality pastoral care** at Bradfield.

The College fully recognises its responsibilities set out in the National Minimum Standards for Boarding Schools and will seek to establish measures which result in facilities, policies and systems that provide care of a high standard. It will aim to make sure that staff appointed to run boarding houses are of the highest available quality, that they are given access to good training and support, and that they are assisted by well-balanced and committed teams, including a full-time Matron attached to each House. Each pupil will also have access to the advice of a Personal Tutor with whom he/she will meet on a regular basis (the College's policy on Tutoring is set out in Advice to all Teaching Staff).

The College will seek to ensure that it knows the whereabouts of pupils. There is a College policy on Registration which includes provision for the registration of day pupils (at the start of the day and during the afternoon session) and the recording of pupil attendance in classes. Attendance at co-curricular activities is also systematically recorded. Absences from classes and co-curricular commitments will be expeditiously investigated and, in association with the routine of house "calls", this will allow HsMs to identify pupils who are not accounted for on campus. Section A9 of the College's "Pastoral Protocols" (*on the College website*) sets out the routine which will be followed when a pupil is unaccounted for.

The College also seeks to ensure the physical safety and security of pupils. There is a comprehensive Health and Safety policy, a fully equipped security team and close attention is paid to the assessment and control of Risk (as detailed in the Risk Assessment policy). Pupils' on-line safety and security is addressed in detail in the IT Acceptable Use policy and the E-Safety policy (*on the College website*) and includes

proportionate monitoring and filtering of pupils' use of the school's IT system. The programme of teaching takes account of "Teaching Online Safety in Schools" (June 2019).

The College Medical Centre is a key partner in the pastoral care of Bradfield's pupils and the College will seek to ensure that the Medical Centre is satisfactorily managed and equipped, that its staff is of high quality and properly qualified, that they have easy access to the advice of the College Medical Advisors, and that their work is supported by training that properly meets their needs. Children will also have access to a professional team of Counsellors and to a College Chaplain.

Personal, Social and Health Education will be provided within the curriculum in Years 9 – 11 (Faulkner's, Shell and Fifth Form) and all houses will support the Sixth Form Wellbeing programme delivered outside the classroom. There will be a broad programme of Wellbeing workshops dealing with key issues (a number of which will entail parental participation), teaching children to keep themselves safe including online.

- (b) The College will ensure that **safer staff recruitment practices** in line with Keeping Children Safe in Education (2 September 2019) are always followed for: all staff employed by the College; all volunteers; all contractors' staff; all trainee teachers; all supply teachers.

All employees, volunteers and other personnel coming into regular contact with pupils will undergo Disclosure and Barring Service (DBS) checks prior to appointment as required by the table set out in KCSIE (2019). Full details of the College's safe recruitment procedures are set out in the *Recruitment Policy* published by the College's Human Resources Department on the College Intranet.

When pupils are taken off-site for educational purposes, assessment of staffing provided by external agencies (e.g.: Field Study Centres) will form part of the risk assessment process. Full details of the College's procedures relating to off-site activities are published in the College's *Educational Visits Policy*.

All newly appointed staff (including any temporary appointments), volunteers and contractors' staff will receive induction appropriate to their role and responsibilities within the College. All will receive induction in Child Protection and Safeguarding and be issued with the College *aide-memoire* which supports staff in their safeguarding responsibilities. They will be given explicit guidance on the conduct expected of staff working at Bradfield. This will include:

- A copy of KCSIE (2019) Part 1 (which they will be required to read) – school leaders and those who work directly with children will also be given Annex A of KCSIE (2019);
- A copy of the Safeguarding and Child Protection Policy
- Details of the identity and function of the DSL and her Deputies, along with their contact details

- The Staff Code of Conduct (in discussion of which they will be given explicit guidance on the conduct expected of staff working at Bradfield College, including guidance on the acceptable use of IT and social media)
- A copy of the Behaviour Policy
- A copy of the Whistleblowing Policy

The College will seek to establish a culture in which all feel able to raise concerns about any employee's practices which *prima facie* seem poor or unsafe, and in which reports of such conduct will be given serious and objective consideration. All newly appointed staff will be told about the College *Whistleblowing Policy* published in the HR folder on the College Intranet. This makes clear that those who 'whistle blow' in good faith will be protected from retribution and immune from disciplinary action. It will be explained that the College seeks to ensure that those who work at Bradfield are not complacent about threats posed by those whose behaviour has neither resulted in a conviction nor a referral to the Disclosure and Barring Service and yet are actively seeking access to children in order to abuse them.

- (c) All who work at Bradfield will receive regular **training** in their child protection responsibilities.

Initial induction training in Safeguarding and Child Protection procedures will be renewed every year (in line with advice from the West Berkshire Contact, Advice and Assessment Team (CAAS) – and a central CP training register will be maintained by the College's HR Department and audited each Summer Term by the College's Compliance Office. Temporary staff, volunteers and employees of contractors who work with children at Bradfield will be given induction training in their child protection responsibilities.

In addition to this induction training, all members of the teaching and pastoral staff will be required to attend annual 'Safeguarding' training, led by the Deputy Head (Pastoral), focussing on the safeguarding and child protection updates issued by the LSP and the discussion of case studies. This training will include material on information sharing, Prevent and on-line safety alongside other child protection issues. Additionally, Housemasters/mistresses, House Matrons and resident boarding tutors will be encouraged to undertake extended training in safeguarding.

The Designated Safeguarding Lead and her Deputies will receive biennial training in Safeguarding and Inter-agency working.

- (d) The College Pastoral Committee and the Child Protection Governor will undertake a termly review of safeguarding at Bradfield. This review will consider the efficiency with which safeguarding duties have been discharged by the Designated Safeguarding Lead and her Deputies and also cover the centralised Register of Staff Appointments. A termly Child Protection report will be presented.

14. Useful Multi-agency contacts and agencies

Agency	Number	Email
Police (Immediate Risk)	999	
Police (Non-Emergency)	101	https://www.thamesvalley.police.uk/ro/report/ocr/af/how-to-report-a-crime/
Contact, Advice and Assessment Team (CAAS) – Children’s Social Services	01635 503 090 Out of hours’ number: 01344 786 543	child@westberks.gov.uk Out of hours’ email: edt@bracknell-forest.gov.uk
Local Authority Designated Officer (LADO) Fiona Goussard	01635 503 090 01635 503 153	cpadmin@westberks.gov.uk
West Berkshire Local Safeguarding Partnerships Child Protection procedures	01635 519 982	https://www.westberkslscb.org.uk/homepage/guidance-procedures/
Children’s Commissioner England	020 7783 8330	help.team@childrenscommissioner.gsi.gov.uk
Ds Kulvinder Bansai, Prevent Officer TVP – Susan Powell PREVENT Lead for WBC Cathy Burnham Prevent Lead for Education	01635 503 090 07788 307 178 01635 246 703 07881 856 801 01635 519 014	child@westberks.gov.uk kulvinder.bansai@thamesvalley.pnn.police.uk susan.powell@westberks.gov.uk cathy.burnham@westberks.gov.uk
Child and Adolescent Mental Health Service - CAMHS	01635 295 555	https://cypf.berkshirehealthcare.nhs.uk/our-services/mental-health-services-camhs/ http://fis.westberks.gov.uk/kb5/westberkshire/fsd/home.page
DoE Preventing extremism in schools and children's services	020 7340 7264	counter.extremism@education.gov.uk
NSPCC	0808 800 5000	help@nspcc.org.uk
ChildLine	0800 1111	
NSPCC Whistleblowing Advice Line	0800 028 0285	help@nspcc.org.uk
CEOP (Child Exploitation and Online Protection)	0370 496 7622 (available 24/7)	communication@nca.gov.uk

This Policy and its implementation procedures set out the arrangements to safeguard and promote the welfare of pupils at the School. They have been prepared in compliance with, and with regard to:

- The Education Acts
- *Education (Independent Schools Standards) Regulations 2014* (as amended from time to time)
- Safeguarding Vulnerable Groups Act 2006 (*Part of Children and Social Work Act 2017*)
- The Protection of Freedoms Act 2012
- The Children Act 2004
- *What to do if you're worried a Child is being Abused* March 2015
- *Working Together to Safeguard Children* March 2018 (A guide to inter-agency working to safeguard and promote the welfare of children)
- *Keeping Children Safe in Education* October 2019
- *Disqualification under the Childcare Act 2018* 1 September 2018
- *Information Sharing: advice for practitioners providing safeguarding services* March 2015
- DBS Referrals Guidance (as may be amended from time to time)
- *Independent Schools Inspectorate Handbook* January 2017– the regulatory requirements (and as amended)
- *National Minimum Standards for Boarding Schools* April 2015
- *Teacher misconduct: regulating the teaching profession* March 2014 (and related guidance)
- *Use of Reasonable Force in Schools* July 2017
- *Information Commissioner's Office Data Sharing Code of Practice* May 2018
- *Preventing and Tackling Bullying* October 2018
- *Prevent Duty Guidance, Channel Guidance, and Prevent Departmental Advice*, 2015
- *Sexual violence and sexual harassment between children in schools and colleges* May 2018