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|  <b>HOLYPORT<br/>COLLEGE</b> | Child Protection Policy      |                 |
|                                                                                                               | Effective Date: 01 Sept 2025 | Version No: 2.6 |

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| <b>Title</b>                                                                                 | <b>CHILD<br/>PROTECTION<br/>POLICY</b>                   |
| <b>Person responsible for policy formulation, implementation, maintenance and evaluation</b> | Designated Senior Lead – Safeguarding                    |
| <b>Persons consulted</b>                                                                     | SLT<br>General Welfare Committee<br>Full Governing Board |
| <b>Date of future review</b>                                                                 | Annual, and no later than 1 <sup>st</sup> September 2027 |

Previous revision dates can be found at the end of the document

| Revision No | Effective Date                 | Summary of Revision                       | Reviewed By | Approved By |
|-------------|--------------------------------|-------------------------------------------|-------------|-------------|
| V2.6        | 1 <sup>st</sup> September 2026 | To update in line with KCSIE 2026 and the | SLT         | Governors   |

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## What to do if you are worried that a child is at risk of harm

1. Contact the College's Safeguarding Team
  - 1.1. Alex Jeffery, Assistant Head Safeguarding and Inclusion, is the College's Designated Safeguarding Lead – [a.jeffery@holyporthcollege.org.uk](mailto:a.jeffery@holyporthcollege.org.uk)
  - 1.2. Deputy Designated Safeguarding Leads are;
    - 1.2.1. Rachel Harding, Director of Inclusive Education (SENCO) - [r.harding@holyporthcollege.org.uk](mailto:r.harding@holyporthcollege.org.uk)
    - 1.2.2. Claire Druce, Curriculum Support Officer – [c.druce@holyporthcollege.org.uk](mailto:c.druce@holyporthcollege.org.uk)
    - 1.2.3. Iris Vilasanchez Pita, House Master – [i.vilasanchez@holyporthcollege.org.uk](mailto:i.vilasanchez@holyporthcollege.org.uk)
2. The Safeguarding Team can be contacted on 01628 640150.
3. If you are still concerned or if you can't reach the Safeguarding Team, please contact:
  - 3.1. Achieving for Children (The Royal Borough of Windsor and Maidenhead) on 01628 683150 their out of hours service on 01344 351999 or via <https://rbwm.afcinfo.org.uk/pages/local-offer/information-and-advice/social-care/single-point-of-access-spa-and>
  - 3.2. Ofsted on 0300 123 3155 ([whistleblowing@ofsted.gov.uk](mailto:whistleblowing@ofsted.gov.uk))
  - 3.3. The NSPCC 0800 800 5000 ([help@nspcc.org.uk](mailto:help@nspcc.org.uk))
  - 3.4. If you consider a child is in immediate danger, phone the police emergency number on 999
4. The NSPCC operates a phone line for College staff to call if they feel the College is not following safe practices or is not following its own safeguarding policies and can be contacted on 0800 028 0285
5. Where a child is at risk of harm, a referral will be made to appropriate external agencies such as Children's Social Care or the police

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6. Our Safeguarding Governor is Reverend Mark Jones - [m.jones@holyporthcollege.org.uk](mailto:m.jones@holyporthcollege.org.uk)

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7. This policy takes into account the following guidance
  - 7.1. What to do if you are worried a child is being abused, March 2015
  - 7.2. Keeping Children Safe in Education, September 2026
  - 7.3. Working Together to Safeguard Children, March 2026
  - 7.4. National Minimum Standards for boarding schools, May 2026
  - 7.5. Prevent duty guidance: England and Wales (2023)
  - 7.6. IICSA (Independent Inquiry into Child Sexual Abuse), October 2022
  - 7.7. Teaching Online Safety in Schools, January 2023
  - 7.8. Guidance for Safer Working Practice for Adults Working with Children and Young People in Educational Settings, Feb 2022
  - 7.9. Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers
8. This policy takes into account the follow legislation:
  - 8.1. Children Act 1989
  - 8.2. Children Act 2004
  - 8.3. Education Act 2002
  - 8.4. Children's Wellbeing and Schools Act 2026

## External Agencies

9. The College is a member of the Boarding Schools' Association and has adopted its Commitment to Care Charter.

## The Safeguarding Partnership

10. The College works collaboratively with the RBWM Safeguarding Partnership and all of its policies and procedures are compliant with the Partnership's requirements. The College's DSL attends the regular Safeguarding Leads Network organised by the partnership and completes its safeguarding audit for schools.
11. The College is enrolled on Operation Encompass with the police and is in regular contact with both the Single Point of Access and Multi-Agency Support Hub (MASH).
12. College staff regularly attend training events organised by the partners, ranging from mental health training, safeguarding training to medical needs training.

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## Responsibility for the implementation of the policy

13. Alex Jeffery is the Designated Safeguarding Lead.
14. Rachel Harding, Claire Druce and Iris Vilasanchez are the Deputy Designated Safeguarding Leads
15. Mark Jones is the Responsible Governor for Safeguarding and Student Wellbeing.
16. All staff have training on safeguarding issues at least annually (with e-bulletin updates as appropriate) and are expected to use their best endeavours to implement this policy effectively.
17. New staff receive safeguarding training as part of their induction.
18. Senior staff with specific responsibility for safeguarding undergo compulsory refresher inter-agency training every 2 years (or attend the regular update sessions delivered by the local authority) and attend specialised training events as appropriate.
19. Student Leaders are given an induction to their role on appointment, which includes how to contribute to the College's anti-bullying practice and how to respond to allegations of serious bullying or abuse.
20. The College has an Independent Listener.
21. Governors receive annual training on safeguarding.

## Governance of Safeguarding

22. The governor responsible for safeguarding plays an essential role in ensuring students are kept safe from harm. The safeguarding governor plays an important role in ensuring oversight and scrutiny of safeguarding policy, procedure and practice on behalf of the full governing body.
23. The following list is indicative and not exhaustive
  - 23.1. act as a 'critical friend' to the College, in order to ensure that the appropriate systems and procedures are in place to cover all aspects of the safeguarding agenda and all statutory governing body responsibilities are met
  - 23.2. monitor appropriate policies, including safeguarding and whistleblowing policies;
  - 23.3. ensure there is a suitably qualified, trained and supported Designated Senior Leader (DSL) who has responsibility for responding to and overseeing safeguarding issues
  - 23.4. ensure there is a suitably qualified, trained and supported safeguarding team which has responsibility for responding to and overseeing safeguarding issues as agreed reasonable to be delegated by the DSL

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- 23.5. ensure that the DSL adequately supervises and supports the work, development and wellbeing of the team and any other individual to whom they may delegate additional safeguarding responsibilities in order that there exist clear lines of accountability;
- 23.6. ensure there is a robust system for recording, storing and reviewing child welfare concerns and issues within the school/locality to enable adequate oversight, understanding and development of solutions
- 23.7. ensure that College staff training is up to date
- 23.8. attend Basic Awareness Safeguarding training every 3 years and other training as appropriate to the role and relevant to issues within the school/locality
- 23.9. ensure other governors attend appropriate safeguarding training
- 23.10. ensure appropriate members of the governing body complete training in respect of allegations against staff
- 23.11. Ensure that governors receive an annual report on safeguarding and that the College fulfils its obligations to the Local Safeguarding Partnership and complies with its reporting cycles.
- 23.12. Take the lead on e-safety, with a particular focus on filtering and monitoring, and ensure that staff have an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring on school devices and school networks and an understanding of the ease of access which students have to harmful materials on their own devices.

## Guiding Principles

- 24. Safeguarding and promoting the welfare of children is ~~now~~ defined as:
  - 24.1. Providing help and support to meet the needs of children as soon as problems emerge
  - 24.2. Protecting children from maltreatment, whether that is within or outside the home, including online
  - 24.3. Preventing the impairment of children's mental and physical health or development
  - 24.4. Making sure that children grow up in circumstances consistent with the provision of safe and effective care
  - 24.5. Taking action to enable all children to have the best outcomes
- 25. A child is anyone under the age of 18.
- 26. Everyone is responsible for safeguarding children. We do this by
  - 26.1. Identifying concerns
  - 26.2. Sharing information
  - 26.3. Taking prompt action, and, more generally
  - 26.4. Creating a safe environment in which children thrive
- 27. Staff maintain an attitude of 'it could happen here'.

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28. The welfare of the child is paramount and we maintain a child-centred approach by considering what is in the best interests of the child whilst taking into account their wishes and feelings.
29. We work in partnership with external agencies, aiming to secure support as early as possible, often at the point where a problem starts to emerge. This may include support from universal services, community-based early help and Family Help services. The College will work with children, families and partner agencies to identify emerging needs and secure appropriate support before statutory intervention becomes necessary.
30. We keep concerns under review and challenge other agencies when we believe the situation is not improving.
31. Staff receive annual training and are updated throughout the year as necessary. This could be face-to-face or online, and e-bulletins are also issued.
32. Members of the Safeguarding Team receive ongoing training to enable their practice to remain current and relevant.
33. Students are empowered to protect themselves and each other. We do this by
  - 33.1. Including opportunities in the curriculum and assemblies for students to develop the skills they need to stay safe
  - 33.2. Creating a safe learning and boarding environment where students support each other
  - 33.3. Encouraging students to speak out against prejudice and bullying in all its form and by challenging bystanders
  - 33.4. Teaching students about the risks they face online
  - 33.5. Publicising the ways in which students can report abuse, and
  - 33.6. Supporting those who may have experienced abuse.
34. We guard against poor practice which is defined as
  - 34.1. failure to act on the early signs of abuse and neglect
  - 34.2. poor record keeping
  - 34.3. failure to listen to the views of the child
  - 34.4. failure to reassess concerns when situations do not improve
  - 34.5. sharing information too slowly
  - 34.6. failure to challenge those who appear not to be taking action.
35. This policy uses the terms ‘victim’, ‘alleged perpetrator’ and ‘perpetrator’ in line with documentation issued by the Department for Education.

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## What College staff should look out for

36. Any child could benefit from early help, but staff should be particularly alert when a child is
- 36.1. Has special educational needs and/or disabilities (SEND)
  - 36.2. Has a mental health needs or concerns
  - 36.3. Is a young carer
  - 36.4. Is at risk of involvement in gangs, county lines or criminal exploitation
  - 36.5. Is frequently missing/goes missing from education, care or home
  - 36.6. Is at risk of modern slavery, trafficking, sexual or criminal exploitation
  - 36.7. Is at risk of being radicalised or exploited
  - 36.8. Has a family member in prison, or is affected by parental offending
  - 36.9. Faces challenges at home such as drug or alcohol misuse, adult mental health issues and domestic abuse
  - 36.10. Is misusing drugs or alcohol themselves
  - 36.11. Has returned home to their family from care
  - 36.12. Is at risk of honour-based abuse such as Female Genital Mutilation or Forced Marriage
  - 36.13. Is a privately fostered child
  - 36.14. Is persistently absent from school
  - 36.15. Has experienced multiple suspensions, is at risk permanent exclusion or is in alternative provision or a pupil referral unit
37. Students with special educational needs may require additional support to help keep them safe from harm. The College recognises that it can be more difficult to identify indicators of abuse in some children with SEND and that the effects of abuse on such children can be even more traumatic than on children who have no additional needs. External agencies such as SHINE, as well as our internal provision, such as drama therapy and ELSA (Emotional Literacy Support Assistant), can work with particularly vulnerable students.
38. **Keeping Children Safe in Education** contains information on a range of specific safeguarding issues of which all staff should be aware, together with sources of support and guidance. These include:
- 38.1. **Child abduction and community safety incidents** - the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. It can be committed by parents or other family members, people known to the child or by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.
  - 38.2. **Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)** - children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children. They can be introduced to crime or sexual activity which may be a one-off occurrence or, more likely, a series of incidents. Exploitation can be opportunistic or can be part of more complex organised abuse. It often involves threats of violence and an

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imbalance of power. They may involve an exchange for something the victim wants, and/or for the financial advantage or increased status of the perpetrator or facilitator'.

- 38.3. **County lines** - children are used to move, store and sell drugs.
- 38.4. **Children and the court system** - children may be required to give evidence in court, either for crimes committed against them or for crimes which they have witnessed. They sometimes are in court accused of crime. Children may need support from school staff if they have to appear in court for whatever reason.
- 38.5. **Children missing from education or absent from education, home or care** - Children missing education and children who are absent from education can be indicators of abuse, neglect, exploitation, mental health concerns or other safeguarding issues. Schools should monitor attendance closely and work with families and other agencies where appropriate.
- 38.6. **Children who have a parent or carer in custody, or who is affected by parental offending** - Children who have a parent or carer in custody, or who are affected by parental offending, may experience emotional, social and financial difficulties and may require additional support.
- 38.7. **Cybercrime** - children with particular skills and interest in computing and technology may inadvertently stray into cybercrime. Children can be referred to the **Cyber Choices** programme which aims to help them redirect their talents and interests in a more positive fashion.
- 38.8. **Domestic abuse** - children can see, hear or experience the effects of domestic abuse in the family home and be adversely affected by it. Young people can also experience domestic abuse within their own intimate relationships. This is also known as teenage relationship abuse. Experiencing domestic abuse can have long lasting emotional impact on children.
- 38.9. **Homelessness** – Being homeless or at risk of homelessness can be a safeguarding concern. Staff should be alert to indicators including housing instability, rent arrears, debt, domestic abuse, anti-social behaviour, or families being asked to leave their accommodation. The DSL will work with housing services and other agencies to secure support at the earliest opportunity. Referrals to housing services do not replace referrals to Children's Social Care where a child is at risk of harm. Particular attention should be given to 16- and 17-year-olds who may be homeless or living independently from their parents or carers.
- 38.10. **Modern slavery and the National Referral Mechanism** - Modern slavery includes human trafficking, slavery, servitude, forced labour, criminal exploitation, financial exploitation and sexual exploitation. Staff should be aware of the signs of exploitation and report any concerns to the DSL. The College will work with appropriate agencies, including the National Referral Mechanism (NRM), to ensure children receive the support and protection they need. Children identified as potential victims may also be supported by an Independent Child Trafficking Guardian (ICTG) where applicable.
- 38.11. **Preventing Radicalisation:** Children can be vulnerable to radicalisation and extremism, including through online influences. Radicalisation is the process by which a person comes to support terrorism or extremist ideologies associated with terrorist groups. Staff should be alert to changes in behaviour, expressions of extremist views, fixation on violence, intolerance of others, or access to extremist material online. The College fulfils its duties under the Prevent Duty and will work with relevant agencies, including the Prevent

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programme and Channel Panel, where appropriate, to provide early support to children who may be vulnerable to radicalisation.

- 38.12. **Looked after children** - The College has a Designated Teacher for Looked after Children. The most common reason for children becoming looked after is as a result of abuse and /or neglect. Staff will be provided with the skills, knowledge and understanding necessary to keep a looked after child safe. In particular, appropriate staff will have the information they need in relation to a child's looked after status (whether or not they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They will also have information about the child's care arrangements and the level of authority delegated to the carer by the authority looking after him/her. The College will work with the designated social worker and the Head Teacher of the Virtual School to improve the outcomes for Looked after Children.
- 38.13. **Children who have a social worker** - children may need a social worker due to abuse, neglect or other complex circumstances. Their experiences of adversity and trauma can leave them vulnerable to further harm.
- 38.14. **Children requiring mental health support** - the College has extensive support for those who are experiencing mental health challenges and also works with a number of external agencies. The College also works proactively to promote mental wellbeing.
- 38.15. **Children who are LGBT** - the fact that a young person may be LGBT is not in itself an inherent risk factor. However, young people who are, or who are perceived to be LGBT, are often targeted by other young people. Risks can be compounded where a young person does not have a trusted adult with whom they can be open. The College has an LGBT+ society and celebrates events such as Gay History Month.
- 38.16. **Gender Questioning Children** - The College recognises that children who are questioning their gender may, in some cases, experience additional vulnerabilities, including bullying, social isolation, mental health difficulties or other safeguarding concerns. Support will be considered on an individual basis, taking account of the child's wishes, wider needs, family circumstances, any relevant professional advice and the College's safeguarding responsibilities. The College will work in partnership with parents wherever appropriate and safe to do so and will take a child-centred approach to supporting gender-questioning children.

## What is abuse?

39. Staff should be aware of indicators of abuse and neglect and
- 39.1. understand that children can be at risk of harm at school, in the home, online and in their wider family and community
  - 39.2. exercise professional curiosity when assessing a child's needs, knowing that a child may not be able to or be at the point where they want to disclose abuse
  - 39.3. understand that abuse is rarely a standalone event with multiple issues often overlapping
  - 39.4. report to the safeguarding team each time when they have a concern about abuse or exploitation

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40. **Physical abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
41. **Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only 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 the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (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, though it may occur alone.
42. **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 online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
43. **Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance 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.
44. **Contextual Safeguarding** - safeguarding incidents and/or behaviours can be associated with factors outside the College and/or can occur between children outside the College. All staff should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding (also referred to as extra familial harm), which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

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45. Abuse can take place within families. However, staff should be aware that extra-familial harm takes a variety of forms and children and young people can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.
46. All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children and young people are at risk of abuse online as well as face to face, and it often happens concurrently. The College recognises the risk of making or sharing nudes and semi-nudes, including images that are digitally altered or wholly generated using artificial intelligence (sometimes described as ‘deepfakes’ or deep nudes’. The College will treat the making, possession or sharing of such content as a safeguarding concern.
47. Children and young people can also abuse their peers online, this can take the form of abusive, harassing and misogynistic messages, the non-consensual sharing of indecent images, the sharing of abusive images and pornography, as well as sharing nudes and semi-nudes.
48. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.
49. **Child sexual exploitation (CSE)** is a form of sexual abuse. It involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities.
50. Sexual exploitation can take many forms ranging from the seemingly ‘consensual’ relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups.
51. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.
52. CSE can occur over time or be a one-off occurrence, and may happen without the child or young person’s immediate knowledge e.g. through others sharing videos or images of them on social media.
53. CSE can affect any child or young person, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some may not realise they are being exploited and may believe they are in a genuine romantic relationship.
54. **Female Genital Mutilation (FGM)** comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a

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form of child abuse with long-lasting harmful consequences. 209. All suspicions and concerns about FGM should be passed to a member of the safeguarding team. Where a teacher discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there is a statutory duty upon that individual to report it to the police.

55. College staff must NEVER examine a student to look for evidence of FGM.
56. College staff need to be aware that some boarders, in particular, may come from areas of the world where FGM is practised.
57. All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.
58. **Serious Violence.** All staff should be aware of indicators which may signal that children are at risk from, or involved in, serious violence. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in educational performance, signs of self-harm, a significant change in wellbeing, signs of assault, unexplained injuries, possession of weapons, or unexplained gifts, money or new possessions.
59. All staff should be aware of the range of factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment, involvement in criminal exploitation and having been involved in offending, such as theft or robbery.
60. **Abuse** is defined as a form of maltreatment of a child or young person. Somebody may abuse or neglect a child or young person by inflicting harm or by failing to act to prevent harm. Children and young people may be abused in a family or in an institution or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by other children and young people.

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## Child on Child Sexual Abuse

61. This section forms part of our Child Protection Policy and sets out what sexual violence and sexual harassment is, how to minimise the risk of it occurring and what to do when it does occur, or is alleged to have occurred.
62. Sexual violence and sexual harassment can occur between children of any age and sex and can occur both inside and outside school, including online. Such behaviour exists on a continuum and may range from inappropriate comments and unwanted sexualised behaviour through to serious sexual assault.
63. Guiding Principles
  - 63.1. sexual violence and sexual harassment (SVSH) can occur between children of any age and sex
  - 63.2. it can occur between two young people or within groups
  - 63.3. whilst anyone can be a victim of sexual violence and sexual harassment, staff should be aware that girls are more likely to be victims
  - 63.4. children with SEND are ~~three times~~ more likely to be abused than their peers
  - 63.5. children who are LGBT+, or perceived to be, are often targeted by their peers
  - 63.6. sexual violence and sexual harassment can occur online and offline and are never acceptable
  - 63.7. children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing
  - 63.8. all allegations should be taken seriously and the victim should be offered appropriate support and protection
  - 63.9. consideration needs to be given to the protection of other children and staff; wherever possible, the victim, if they wish, should be able to continue in their normal routine.
64. We make it clear to our students and staff that
  - 64.1. SVSH is never acceptable and it is not an inevitable part of growing up
  - 64.2. describing SVSH as 'banter' or 'boys being boys' is unacceptable
  - 64.3. not challenging unacceptable behaviours such as lifting up skirts, grabbing bottoms, breasts or genitalia, pulling trousers down (debugging) and flicking bras risks normalising these behaviours
  - 64.4. such behaviours are potentially criminal in nature
  - 64.5. everyday sexist stereotypes, language and behaviours do exist in wider society but that is no reason for us as a school to accept that.
65. Sexual Violence

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- 65.1. Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents
- 65.2. Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents
- 65.3. Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)
- 65.4. Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)
66. Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitalia or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm.
67. What is consent?
  - 67.1. consent is about having freedom and capacity to choose
  - 67.2. it can be given to one sort of sexual activity but not to another e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom
  - 67.3. it can be withdrawn at any time during sexual activity and each time sexual activity occurs
  - 67.4. a child under 13 can never consent to any sexual activity, owing to their age and vulnerability;
  - 67.5. is only possible if the individual has the freedom and capacity to make that choice
  - 67.6. the age of consent is 16.
68. What is sexual harassment?
  - 68.1. sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
  - 68.2. sexual 'jokes' or taunting
  - 68.3. physical behaviour such as deliberately brushing against someone, interfering with clothing and displaying pictures, drawings or photos of a sexual nature
  - 68.4. online sexual harassment which may include the sharing of sexual images and videos, sexualised online bullying, unwanted sexual comments and messages and sexual exploitation with coercion and threats.

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69. Children's sexual behaviour exists on a continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. When considering harmful sexual behaviour, ages and the stages of development between children are critical factors to consider.
70. Sexual behaviour can be considered to be harmful if
  - 70.1. one of the children is much older, particularly if there is more than two years difference
  - 70.2. if one child is pre-pubescent and the other is not one child is disabled or smaller in stature.
71. Preventing sexual violence and sexual harassment
  - 71.1. the College trains its staff at least annually on safeguarding
  - 71.2. members of the safeguarding team attend compulsory and extra training as necessary
  - 71.3. the Personal Development programme includes age appropriate Relationships and Sex Education (RSE) and teaches young people how to stay safe
  - 71.4. external providers, particularly the RBWM Youth Service, conduct annual workshops for students with the aim of keeping them safe in a wide variety of contexts
  - 71.5. The College has an Acceptable Use Agreement for Electronic Devices which covers all aspects of how to stay safe online and outlines the expected standards of conduct when interacting with other students at the College and beyond
72. Responding to reports of SVSH
  - 72.1. reports of SVSH are likely to be complex, requiring difficult professional decisions to be made, often quickly and under pressure - the DSL or a member of the safeguarding team will lead on all allegations
  - 72.2. victims should be reassured that they are being taken seriously and that they will be supported and kept safe
  - 72.3. confidentiality should never be promised - the initial report should only be shared with those people necessary to progress it i.e. the DSL or a member of the safeguarding team
  - 72.4. explain to the victim what the next steps will be and who the report will be passed to
  - 72.5. it is best practise to have two staff members present when taking the report (preferably one being the DSL or member of the safeguarding team), but this may not always be possible
  - 72.6. listen carefully, being non-judgemental, being clear about boundaries, not asking leading questions and only prompting where necessary with open questions
  - 72.7. best practice is to wait until the end of a conversation to write up a full report on 'My Concern' – any note taking should be minimal and not be allowed to disrupt the flow of the conversation
  - 72.8. only facts as the child presents them should be recorded and not contain the opinions of the member of staff taking the notes
  - 72.9. inform the DSL or a member of the safeguarding team as soon as is possible, with a minimum of delay and then record the notes on 'My Concern'
  - 72.10. parents or guardians should be informed (unless this would put the victim at greater risk)
73. What will the DSL do?

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- 73.1. the DSL will listen carefully and consider what action to take to support and protect the victim and other members of the College community
- 73.2. the DSL will consider what support is necessary from external agencies such as the police or children's social care, making referrals where necessary – if a child is at risk of harm, is in immediate danger, or has been harmed, or an allegation or disclosure of rape, assault by penetration or sexual assault is made, a referral is always made. The College will seek to maintain the anonymity of victims of SVSH and to manage media and social media interest
- 73.3. all concerns, discussions, decisions and reasons for decisions should be recorded on 'My Concern'

#### 74. Risk Assessment

- 74.1. in cases of sexual violence, an immediate risk and needs assessment needs to be made
- 74.2. where there has been a report of sexual harassment, the need for a risk assessment needs to be considered on a case by case basis
- 74.3. The risk and needs assessment should consider
  - 74.3.1. the victim, especially their protection and support
  - 74.3.2. the alleged perpetrator
  - 74.3.3. all other members of the College community and any measures necessary to protect them
  - 74.3.4. advice from specialist services, children's social care

#### 75. Risk assessments must be recorded and kept under review.

#### 76. How allegations of SVSH and sexting / making or sharing nudes and semi-nudes are investigated poses a particular challenge for the College. The victim and the alleged perpetrators, and their families and friends, are likely to be in an emotional state and it will be very difficult to keep everyone on board during the investigation. As criminal action may need to be taken, it is also vitally important that the College works with statutory agencies and only carries out investigations as approved by them.

- 76.1. Victims and alleged perpetrators will be kept apart during investigations in as far as this is possible
- 76.2. Mobile phones or other electronic equipment may be confiscated if it is suspected that youth produced sexual imagery is on the phone. Staff must not access this and the matter has been discussed with the MASH team first
- 76.3. The College must be sensitive when interviewing witnesses and notes must be taken of all such interviews
- 76.4. Parents/carers of all those involved should be informed as to their child's involvement in the process
- 76.5. If a student has an allocated social worker, they must be informed of any child on child abuse allegation, as must the Virtual head in the case of a looked after child

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- 76.6. The College will share all records relating to the allegation to statutory agencies Actions following a report of SVSH
- 76.7. The College will consider the wishes of the victim in terms of how they want to proceed, giving them as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support they will be offered
- 76.8. where the victim does not want a concern or disclosure to be passed on to other agencies, the College will consider this request in the light of its wider safeguarding obligations and sensitively support the student where this request cannot be honoured
- 76.9. the nature of the alleged incident and whether a crime has been committed and consideration of harmful sexual behaviour
- 76.10. the age of the children involved
- 76.11. the developmental stages of the children involved; any power imbalance between the children
- 76.12. if the incident is a one-off or a pattern sustained pattern of abuse
- 76.13. if there are ongoing risks to the victim or other members of the College community
- 76.14. how best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted).
  
77. Whilst the College establishes the facts of rape, assault by penetration or sexual assault allegations and starts the process of liaising with the police and children's social care, the alleged perpetrator should be removed from any classes they share with the victim and consideration should be made as to how to keep them reasonably apart on College premises or transport – this is in the best interests of both children and should not be perceived to be a judgement of guilt of the alleged perpetrator
  
78. In other cases of SVSH, the proximity of the victim to the alleged perpetrator should be considered immediately
  
79. The College follows guidance as issued by the Local Safeguarding Partnership and may also consult the Harmful Sexual Behaviour Support Service for advice when dealing with allegations of child on child abuse. We may manage internally or refer to external agencies depending on the circumstances.
  - 79.1. Manage internally - in some cases of sexual harassment, for example, one-off cases, the College may take the view that early help or statutory intervention is not necessary and the incident can be handled in line with behaviour and bullying policies
  - 79.2. all concerns, discussions, decisions and reasons for decisions should be recorded on 'My Concern'
  
80. College led investigations and case management
  - 80.1. How allegations of Sexual Violence and Sexual Harm and sexting / making or sharing nudes and semi-nudes are investigated poses a particular challenge for the College. The victim and the alleged perpetrators, and their families and friends, are likely to be in an emotional state and it will be very difficult to keep everyone on board during the

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investigation. As criminal action may need to be taken, it is also vitally important that the College works with statutory agencies and only carries out investigations as approved by them.

- 80.2. Victims and alleged perpetrators will be kept apart during investigations in as far as this is possible
- 80.3. Mobile phones or other electronic equipment may be confiscated if it is suspected that youth produced sexual imagery is on the phone. Staff must not access this and the matter must be discussed with the MASH team
- 80.4. The College must be sensitive when interviewing witnesses and notes must be taken of all such interviews
- 80.5. Parents/carers of all those involved should be informed as to their child's involvement in the process
- 80.6. The College will share all records relating to the allegation to statutory agencies
- 80.7. all concerns, discussions, decisions and reasons for decisions should be recorded on 'My Concern'

#### 81. Early help

- 81.1. students but may benefit from early help, which means providing support as soon as a problem emerges for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse
- 81.2. in some cases of sexual harassment, the College may decide that the children involved do not require statutory intervention
- 81.3. all concerns, discussions, decisions and reasons for decisions should be recorded on 'My Concern'

#### 82. Referrals to children's social care

- 82.1. where a child has been harmed, is at risk of harm, or is in immediate danger, a referral to children's social care is made
- 82.2. the College will inform parents or guardians, unless there are compelling reasons not to do so and this has been discussed and agreed with children's social care
- 82.3. the College cooperates fully with children's social care where statutory assessments are required
- 82.4. the College should not wait for the outcome, or even the start, of a children's social care investigation before protecting the victim and other members of the College community
- 82.5. the DSL should take into account any advice given by children's social care when writing, reviewing and updating the risk assessment
- 82.6. on occasion, children's social care may consider statutory assessment to be unnecessary – the College will press for reconsideration and use the safeguarding partnership's escalation policy if it remains concerned
- 82.7. all concerns, discussions, decisions and reasons for decisions should be recorded on 'My Concern'.

#### 83. Reporting to the police

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- 83.1. where a report of rape, assault by penetration or sexual assault is made, the starting point is this should be reported to the police
- 83.2. at this stage, the College will generally inform parents unless there are compelling reasons not to do so and this has been discussed and agreed with the police
- 83.3. the College must discuss with the police what information can be shared with the alleged perpetrator, parents and guardians, College staff and the victim and their family
- 83.4. the College should consider the best way to protect the victim and their anonymity
- 83.5. all concerns, discussions, decisions and reasons for decisions should be recorded on 'My Concern'.

#### 84. Bail conditions and 'Released Under Investigation' or 'RUI'

- 84.1. where bail or RUI is deemed proportionate and necessary, the College will work with children's social care and the police to manage any implications and safeguard all members of the College community
- 84.2. the College should work closely with the police to ensure that any actions it takes do not jeopardise the police investigation
- 84.3. all concerns, discussions, decisions and reasons for decisions should be recorded on 'My Concern'

#### 85. The end of the criminal process

- 85.1. if a child is convicted or receives a caution for a sexual offence, the College will update its risk assessment and consider any suitable action in light of its behaviour policy
- 85.2. if the perpetrator remains in the College, it will be very clear to the perpetrator as to its expectations and any restrictions it thinks are reasonable and proportionate with regards to the perpetrator's timetable and participation in wider College life
- 85.3. where a not guilty verdict is returned, this can be very traumatic for the victim and support should be provided
- 85.4. the accused will also likely need support
- 85.5. where no further action is to be taken by the police, for whatever reason, it does not necessarily mean that an allegation was unfounded, therefore the College may continue to proceed with disciplinary action where necessary
- 85.6. both victim and alleged perpetrator will likely need ongoing support
- 85.7. all concerns, discussions, decisions and reasons for decisions should be recorded on 'My Concern'.

#### 86. Safeguarding and supporting the victim

- 86.1. the needs and wishes of the victim should be paramount
- 86.2. immediate consideration needs to be given to the medical needs of a victim i.e. unplanned pregnancy, the likelihood of a Sexually Transmittable Infection
- 86.3. the victim should, if they wish, be able to continue in their normal daily routine
- 86.4. support should be tailored on a case-by-case basis

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- 86.5. College counselling, art therapy or other forms of support should be considered as well as external support from the Children and Young People's Independent Sexual Violence Advisors (ChISVAs) whose contact details can be found at Rape Crisis or The Survivors Trust
- 86.6. The Internet Watch Foundation may be able to help with the removal of illegal image
- 86.7. the College will appoint, should the victim wish for it, a trusted adult from whom the victim can receive continual support
- 86.8. the College will do everything it reasonably can to protect the victim from bullying and harassment and to prevent others 'taking sides'
- 86.9. if the victim decides to move school, the College will do all it reasonably can to support the move to another school and will make the new school aware of any ongoing needs.

#### 87. Safeguarding and supporting the alleged perpetrator

- 87.1. the College has a difficult balancing act to consider - on the one hand, supporting the victim and on the other hand providing the alleged perpetrator with an education, safeguarding support as necessary and implementing any disciplinary sanctions
- 87.2. the College will work with professionals as required to try to understand why a child may have abused a peer – it may be a sign that they may have been abused or a sign of a wider issue that requires addressing within the culture of the College
- 87.3. it is important to remember that, as a child, any alleged perpetrator is entitled to, deserving of, and should be provided with, a high level of support to help them understand and overcome the reasons for their behaviour and help protect other children by limiting the likelihood of them abusing again
- 87.4. if the alleged perpetrator moves to another school, it must be made aware of any ongoing support needs and the DSL should transfer the child protection file to the new school.

#### 88. Safeguarding and supporting others

- 88.1. Following an incident or allegation, consideration should be given to supporting children (and adult students) who have witnessed sexual violence as it is likely to have been a traumatic experience
- 88.2. The College also recognises that students may take sides and will do all it can to ensure that neither victim nor alleged preparator is being bullied, or that the smooth management of the school is affected
- 88.3. Social media and school transport can easily become places where bullying of the victim or alleged perpetrator occurs. The College will take action against any student enflaming the situation online or otherwise and point out that it could be viewed as interference in a criminal investigation
- 88.4. The College has a proactive strategy to promote students' wellbeing and understanding of safeguarding and the law, mainly through its Personal Development Programme , collapsed timetable days and assemblies. The College will also consider what reactive support may be needed for the student body should an incident of child on child abuse require such a response. Discipline and the alleged perpetrator

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89. Disciplinary action can be taken whilst other investigations by the police and/or children's social care are ongoing. The fact that another body is investigating or has investigated does not in itself prevent a school from coming to its own conclusion, on the balance of probabilities, about what happened, and imposing a penalty accordingly. The school should consider if by taking any action, they would prejudice an investigation and/or any subsequent prosecution. Careful liaison with the police and children's social care should help the school to make a determination. It will also be important to consider whether there are circumstances that make it unreasonable or irrational for a school to reach its own view about what happened while an independent investigation is considering the same facts.
90. Taking disciplinary action and still providing support are not mutually exclusive actions. They can, and should, occur at the same time.
91. Working with parents and guardians
  - 91.1. the College will engage with both the parents of the victim and of the alleged perpetrator
  - 91.2. the College may be restricted in what it can say to either party by the police or children's social care
  - 91.3. it is good practice for the College to meet with parents and victim together to discuss ongoing support
  - 91.4. it is also good practice for the College to meet with the parents or guardians of the alleged perpetrator to discuss and explain any decisions the College has made and ongoing support where necessary
  - 91.5. The College may also have to discuss how siblings of the victim or alleged perpetrator may be impacted by the reports of child on child abuse and what support may be needed
92. At the conclusion of a case, the DSL should review the circumstances of the case with other professionals as appropriate to determine whether there are any improvements to be made to the College's procedures or practice to help prevent similar events in the future.
93. Support Services
94. The College is pleased to work with a number of external agencies which provide support to our students.
  - 94.1. In general, the College will seek the permission of parents before allowing a student to engage with an external agency. However, where a student is clearly Gillick Competent and does not want parents or those with parental responsibility to know that they are seeking support, the College may access that support for the young person if in doing so the risk of harm to the young person is reduced. All agencies that work at the College encourage all students in this situation to inform their parents once they are ready to do so
  - 94.2. Where abuse is suspected, or where the student concerned is considered to be too young or at risk of harm, this is always reported to the DSL.

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## Violence Against Women and Girls (VAWG)

95. The College recognises that violence against women and girls (VAWG) is a safeguarding issue that can affect children and young people. VAWG may be associated with misogyny, harmful gender stereotypes, sexual harassment, sexual violence, coercive or controlling behaviour, abuse within intimate relationships, and other forms of gender-based abuse.
96. The College promotes respectful relationships, equality and positive masculinity through its Personal Development and RSHE programmes. Students receive education on healthy relationships, consent, misogyny, online harms, sexual harassment and gender-based violence. The College also works with a range of specialist external organisations and speakers to support this work and to challenge harmful attitudes and behaviours. These may include workshops, assemblies and targeted interventions designed to promote respect, challenge misogyny and reduce the risk of violence against women and girls.
97. Staff should be aware that children may be exposed to harmful attitudes and beliefs through peer groups, social media, online communities and influencers who promote misogynistic or discriminatory views. Such influences can contribute to the normalisation of abusive, controlling, intimidating or degrading behaviour towards women and girls.
98. The College promotes a culture of respect, equality and healthy relationships and will challenge misogyny, sexist language, gender-based harassment and harmful attitudes towards women and girls. Concerns will be responded to in accordance with the College's safeguarding, behaviour and child-on-child abuse procedures.
99. Staff should remain alert to behaviours that may indicate a child is vulnerable to, or displaying harmful attitudes associated with violence against women and girls and should report concerns to the DSL.
100. The College adopts a preventative approach and seeks to address harmful attitudes before they develop into abusive behaviours.

## What College staff should do if they are concerned about a child

101. If you are worried a student is at risk of harm, you must
  - 101.1. Inform the DSL or a member of the Safeguarding Team without delay and always before the student goes home - do not assume that someone else has already done this or intends to do so
  - 101.2. Speak to or email the DSL and then provide a written report on My Concern, and consider whether you feel it necessary to make a referral to Children's Social Care yourself, which is your right, bearing in mind that the DSL is usually the most appropriate person to do so.
102. Where a student has disclosed abuse
  - 102.1. We take the disclosure seriously and keep the student safe
  - 102.2. We never give them the impression they have created a problem for us

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- 102.3. We guard against them having feelings of shame
- 102.4. We take into account their wishes and feelings whilst upholding our responsibility to protect them
- 102.5. We don't promise confidentiality and we don't ask leading questions
- 102.6. We only tell those who need to know about the disclosure
- 102.7. We only record the facts as the student presents them
- 102.8. We pass the information on to the DSL or the Safeguarding Team without delay and make an entry on My Concern

103. The DSL will:

- 103.1. Consider what actions need to be taken to protect the young person and decide if the matter can be dealt with internally or not
- 103.2. Make a detailed referral to Children's Social Care which enables them to properly assess the situation and consider the most appropriate next steps, and
- 103.3. In situations where a child is at risk of harm, is in immediate danger, or has been harmed, or an allegation or disclosure of rape, assault by penetration or sexual assault is made, always refer to the appropriate external agencies.
- 103.4. Mandatory Reporting of Child Sexual Abuse. The College recognizes its duties under the Children's Wellbeing and Schools Act 2026 in relation to the mandatory reporting of child sexual abuse. The DSL will ensure that any mandatory report is made in accordance with the requirements of the legislation and any associated statutory guidance.

104. All concerns, discussions, decisions and reasons for decisions are recorded on My Concern. There should be a clear and comprehensive summary of the concern with details of how the concern was followed up and resolved, with notes of actions taken, decisions reached and the outcome.

105. The following must also be borne in mind

- 105.1. all notes relating to child protection disclosures or concerns are highly confidential
- 105.2. historical notes are stored in a safeguarding file, not in the student's general school file, and new concerns are recorded on 'My Concern'
- 105.3. College staff must not make copies for themselves
- 105.4. discussion amongst colleagues about child protection cases must only be conducted with those who have a responsibility for that particular young person
- 105.5. general announcements at staff meetings or briefings can only be made with the permission of the DSL or Headteacher, and with the knowledge of the young person/parent/persons with parental responsibility
- 105.6. in order to ensure the smooth running of the College and of boarding houses and to promote the welfare of students, other College staff may be informed of child protection concerns.
- 105.7. This will be done with the knowledge of those with parental responsibility and the student concerned
- 105.8. The Headteacher is always informed when a referral has been made to Children's Social Care.

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## Concerns or allegations about staff, volunteers or adults associated with the College

106. Concerns about staff, volunteers or other adults associated with the College e.g. a visiting speaker must be reported directly to the Head. In his absence, the DSL and Deputy Head must be informed.
107. Where the concern or allegation relates to the Head, this must be reported directly to the Chair of Governors who will inform the LADO of the concern.
108. The College will report to the appropriate authorities adults who are not in its direct employment e.g. supply teachers, trainee teachers, external contractors and members of the catering teams, should an allegation be made or a concern raised.
109. Historic allegations of abuse are reported to the police and/or the Local Authority Designated Officer (LADO).
110. There are occasions when concerns are raised that an adult has:
  - 110.1. behaved in a way which has harmed or may have harmed a student;
  - 110.2. possibly committed a criminal offence against a student or young person; or
  - 110.3. behaved towards a student in a way that indicates he or she may pose a risk of harm to children;
  - 110.4. behaved or may have behaved in a way that indicates they may not be suitable to work with children

In these situations, the LADO is always consulted.
111. The student who has raised the concern must be looked after and supervised by suitably trained staff and not allowed to mix with other students until next steps have been agreed either internally or in consultation with the LADO.
112. The College will decide who is best placed to inform the parents/carers and the member of staff involved.
113. Parents will be kept informed about the progress of a case and told the outcome where there is not a criminal prosecution. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed, but the parents or guardians of the student will be told the outcome.
114. In cases where the student may have suffered significant harm, or there may be a criminal prosecution, the College and children's social care will consider what support the student might need.

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115. The College will also keep the person who is the subject of the allegations informed of the progress of the case, unless there are objections from the police or children's social care, and consider what other support is appropriate for the individual, for example employee welfare arrangements. If the person is a member of a union or professional association, s/he will be advised to contact that body at the outset. Every effort will be made to resolve cases as quickly as possible as far as this is consistent with a fair and thorough investigation.
116. Every effort will be made to maintain confidentiality and guard against unwanted publicity while an allegation is being considered or during a subsequent investigation. The Education Act 2011 introduced reporting restrictions preventing the publication of any material which may lead to the identification of a teacher who has been accused by, or on behalf of, a student at the same school (where that identification would identify the teacher as the subject of the allegations). The reporting restrictions apply until the point that the accused person is charged with an offence, or until the Secretary of State publishes information about an investigation or decision in a disciplinary case arising from the allegation. The reporting restrictions also cease to apply if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so or if a judge lifts restrictions in response to a request to do so. The use of social media by a parent would also represent a breach of the reporting restrictions and parents will be informed of this.
117. A record of the allegation and how it was followed up and resolved will be kept on the individual's confidential personnel file and a copy will be provided to the individual concerned. The purpose of the record is to enable accurate information to be given in response to any future request for a reference if the individual has left the College. It will provide clarification in cases where a future DBS Disclosure reveals information from the police about an allegation that did not result in a criminal conviction and will help to prevent unnecessary re-investigation if as sometimes happens an allegation resurfaces after a period of time. The record will be retained in accordance with DfE guidelines. Allegations that are found to be malicious will be removed from personnel records and any that are false, unsubstantiated, unfounded or malicious will not be referred to in employer references. A history of repeated concerns or allegations which have been found to be unsubstantiated will also not be referred to in employer references. Records which need to be retained are kept up until the normal retirement age or for 10 years from the date the allegation was made if that is longer.
118. If a staff member or volunteer has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned, the Head will report allegations and their outcomes to the Disclosure and Barring Service (DBS)  
<https://www.gov.uk/government/publications/dbs-referrals-form-and-guidance>. In the case of a teacher, the Teacher Regulation Agency (TRA) will, where applicable, be informed.
119. The College does not enter into so called Settlement/Compromise Agreements in child protection matters and the departure or resignation of a member of staff against whom an allegation is made will not result in any investigations being dropped.
120. The following definitions are used when determining the outcome of allegation investigations: •

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- 120.1. substantiated: there is sufficient identifiable evidence to prove the allegation
  - 120.2. false: there is sufficient evidence to disprove the allegation
  - 120.3. malicious: there is sufficient evidence to disprove the allegation and there has been has been a deliberate act to deceive
  - 120.4. unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
  - 120.5. unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made
121. Suspension of a member of staff will only be considered in a case where there is cause to suspect that a student is at risk of significant harm, or the allegations warrant an investigation by the police, or it is so serious that it might be grounds for dismissal. The decision to suspend a member of staff will be taken by the Headteacher after discussion with the LADO and Chair of the Governing Board. The rationale and justification for suspension must be recorded by both the College and the DO. This will include a record of what alternatives to suspension were considered and why they were rejected. Written confirmation to the suspended member of staff must be dispatched within one working day, giving as much detail as appropriate for the reasons for the suspension. Welfare arrangements will be considered and the member of staff will be given a named contact within the organisation at the point of suspension. Social contact with colleagues and friends will not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.
122. For those cases where it is immediately clear that the allegation is unfounded or malicious, they should be resolved within one week. Where the initial consideration decides that the allegation does not involve a possible criminal offence it will be for the College to deal with it, in consultation with the LADO. In such cases, if the nature of the allegation does not require formal disciplinary action, the College will institute appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, the hearing should be held within 15 working days.
123. When an allegation has become the subject of a full criminal investigation, the College will receive information from the police as to the outcomes of the investigation. The College will ask the police to share evidence from those interviewed so as not to delay this process. This will enable the College to take disciplinary action where appropriate. In cases which are dismissed or where the accused is found to be not guilty of a criminal offence, the College will consider in consultation with the DO whether there is any disciplinary case to answer. If the member of staff is to return to work, the College will work with the individual to support them as they re-integrate to school life.
124. At the conclusion of a case in which an allegation is found to be substantiated, the College should review the circumstances of the case to determine whether there are any improvements to be made to help to prevent similar events in the future. The review must also look at the use of staff suspension and should consider how future investigations of a similar nature could be carried out without suspending the member of staff.

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125. An appropriate sanction will be applied to any student found to have made a malicious allegation. This could include temporary, or permanent, exclusion from school. However, the College will also have to consider what prompted the student to make the allegation in the first place and consider what support the student might need.

## Low-Level Concerns

126. The College promotes an open and transparent culture in which all concerns about adults are
- 126.1. shared responsibly and with the right person, enabling the College to identify inappropriate, problematic or concerning behaviour early
  - 126.2. recorded and dealt with properly, thus minimising the risk of abuse
127. The College's Code of Conduct for Staff and Volunteers ensures that adults working in or on its behalf are clear about professional boundaries as well as the ethos and values of our institution.
128. Behaviours which do not align with the Staff Code of Conduct or the College's ethos and values exist on a wide spectrum, from the inadvertent or thoughtless, through to that which is ultimately intended to enable abuse.
129. All staff need to be informed about and be able to identify concerning, problematic or inappropriate behaviour and understand the importance of sharing concerns when they observe behaviour which violates the College's Staff Code of Conduct.
130. The term 'low-level concern' does not mean that it is insignificant, it means that an adult's behaviour towards a child does not meet the harm threshold.
131. A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt', that an adult may have acted in a way that
- 131.1. is inconsistent with the College's Code of Conduct for Staff and Volunteers, including inappropriate conduct outside of work
  - 131.2. does not meet the allegation threshold or is otherwise not serious enough to consider a referral to the LADO, but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary
132. Allegations that may meet the harm threshold indicate that an adult who works with children has
- 132.1. behaved in a way that has harmed a child, or may have harmed a child
  - 132.2. possibly committed a criminal offence against or related to a child
  - 132.3. behaved towards a child or children in a way that indicates they may pose a risk of harm to children
  - 132.4. behaved or may have behaved in a way that indicates they may not be suitable to work with children

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133. The aims of this Low-Level Concerns Policy are to
- 133.1. ensure that staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour – in themselves and others, and the delineation of professional boundaries and reporting lines
  - 133.2. empower staff to share any low-level concerns and to help all staff to interpret the sharing of such concerns as a neutral act
  - 133.3. address unprofessional behaviour and support the individual to correct it at an early stage
  - 133.4. identify concerning, problematic or inappropriate behaviour, including any patterns, that may need to be consulted upon with (on a no-names basis if appropriate), or referred to, the LADO
  - 133.5. provide for responsive, sensitive and proportionate handling of such concerns when they are raised, and
  - 133.6. help identify any weaknesses in the College's safeguarding systems or ways of working
134. The College will always respect the personal data of staff (and others, where they may be identifiable) in implementing the Low-Level Concerns Policy and in keeping records of low level concerns secure
135. The Data Protection Act 2018 includes a specific provision which permits organisations to process even the most sensitive personal data where necessary for the purposes of protecting children from harm.
136. A proportionate approach must be taken by all to consider what personal data is in fact necessary to share and record by way of low-level concern(s) in each case in order to support the safeguarding purpose and to ensure the information is accurate, fair and as far as possible recorded in neutral terms
137. If a member of staff who raises a low-level concern does not wish to be named, then the College will respect their wishes as far as possible.
138. All staff are entitled, under data protection law, to ask to see the content of any low-level concern(s) retained by the College as it relates to them personally and to make any reasonable objection as to the fairness or accuracy of that content. The College will process such requests within the period prescribed by law, subject always to any necessary protection of the rights of third parties and unless any other relevant exemptions apply (including if complying with the request would be likely to prejudice the safeguarding purpose of the Low-Level Concerns Policy). If the content of a low-level concern is disputed, it may not be appropriate for the College to delete or alter the original record, but a note may be recorded alongside reflecting the staff member's alternative account or objection(s).
139. All personal data processed in connection with the Low-Level Concerns Policy will be processed in accordance with the School's Privacy Notices and its Data Protection Policy.

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140. Low-level concerns should be reported to the Headteacher or the DSL either in person or by email.
141. All low-level concerns are recorded by the DSL.
142. Where a low-level concern relates to a person employed by a supply agency or a contractor, the College will notify that person's employer so that any potential patterns of inappropriate behaviour can be identified.
143. Following receipt of a low-level concern, the College will. Although not necessarily in the order below but in an appropriate sequence according to the nature and detail of the particular concern shared with them
  - 143.1. speak to the person who raised the low-level concern
  - 143.2. speak to any potential witnesses, unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted.
  - 143.3. speak to the individual about whom the low-level concern has been raised, unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted
  - 143.4. if they are in any doubt, seek advice from the LADO, on a no-names basis if necessary
  - 143.5. review the information and determine whether the behaviour in question
    - 143.5.1. is entirely consistent with the College's Code of Conduct for Staff and Volunteers and the law
    - 143.5.2. constitutes a low-level concern
    - 143.5.3. is not serious enough to consider a referral to the LADO but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary
    - 143.5.4. when considered with any other low-level concerns previously raised about the same person, could now meet the threshold of an allegation, and should be referred to the LADO
    - 143.5.5. in and of itself meets the threshold of an allegation and should be referred to the LADO
144. Ensure that appropriate and detailed records are kept of all internal and external conversations regarding the concern, the determination, the rationale for decisions and any actions taken, and retain records in accordance with the Low-Level Concerns Policy.
145. Consider whether the concern also potentially raises misconduct or capability issues, taking advice from the HR department on a named or no-names basis where necessary and, if so, refer the matter to the HR department.
146. Where it is determined that behaviour does not constitute a low-level concern, the member of staff concerned and the referrer will be told why this decision has been arrived at.
147. Where it is determined that behaviour constitutes a low-level concern

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- 147.1. The College will respond in a sensitive and proportionate way, on the one hand maintaining confidence that such concerns when raised will be handled promptly and effectively, whilst on the other hand protecting staff from any potential false allegations or misunderstandings.
- 147.2. Any investigation of low-level concerns will be done discreetly and on a need-to-know basis.
- 147.3. Many low-level concerns will not give rise to any ongoing concern and, accordingly, may be most appropriately dealt with by means of management guidance and/or training or a conversation with the individual about whom the concern has been raised.
- 147.4. Any such conversation with individuals in these circumstances will include being clear with them as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question.
- 147.5. Ongoing and transparent monitoring of the individual's behaviour may be appropriate.
- 147.6. An action plan or risk assessment which is agreed with the individual, and regularly reviewed with them, may also be appropriate.
- 147.7. Some low-level concerns may also raise issues of misconduct or poor performance. If the College determines that the disciplinary or capability procedure is triggered, the individual will have a full opportunity to respond to any factual allegations which form the basis of capability concerns or a disciplinary case against them.
- 147.8. Staff should be aware that when they share what they believe to be a low-level concern, the College will speak to the adult who is the subject of that concern unless advised not to do so by the LADO, no matter how 'low' level the concern may be perceived to be, to gain the subject's account and to make appropriate records, which may be referenced in any subsequent disciplinary proceedings.
- 147.9. How the College responds to a low-level concern may be different depending on the employment status of the individual who is the subject of the concern i.e. whether they are an employee or worker to whom the College's disciplinary and/or capability procedure would apply or a contractor, governor or volunteer. The College's response will be tailored accordingly.
148. When considered with any other low-level concerns that have previously been shared about the same individual, the new concern may lead to a conversation with or referral to the LADO.
149. The College will retain all records of low-level concerns (including those which are subsequently deemed by the School to relate to behaviour which is entirely consistent with the College's Staff Code of Conduct) in a central low-level concerns file.
150. Where multiple low-level concerns have been shared regarding the same individual these will be kept in chronological order as a running record, and with a timeline alongside.
151. These records will be kept confidential and held securely with access afforded only to a limited number of individuals such as the Headteacher and the DSL

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152. The College will review the central low-level concerns file periodically to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. A record of these reviews will be made.
153. Where a pattern of behaviour is identified in respect of a specific individual, the College will also consider whether any wider cultural issues are at play that may have enabled the behaviour and/or whether the College should arrange for additional training or a review of any of its policies to reduce the risk of it happening again.
154. Low-level concerns will be retained securely by the College for as long as deemed relevant and necessary for a safeguarding purpose. In most cases, once a staff member leaves the College, any low-level concerns which are held relating to them will be removed.
155. Where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and is found to be substantiated, it will be referred to in a reference.
156. Low-level concerns (or a group of concerns) which have not met the threshold for referral to the LADO which relate only to safeguarding will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance.

## Physical Intervention

157. The section of the safeguarding policy aims
  - 157.1. protect staff and students from harm
  - 157.2. create a calm and ordered environment where the risk of physical intervention being needed is minimised
  - 157.3. protect students from any physical intervention that is unnecessary, inappropriate, excessive or unlawful
  - 157.4. provide adequate information and training for staff so that they are clear about what constitutes appropriate intervention and can deal effectively with violent or potentially violent situations
  - 157.5. provide support to staff and students who have been assaulted and have suffered verbal abuse from students, other staff or parents.
158. Physical intervention is a course of action taken by a member of staff or other authorised person under Section 93 of the Education and Inspections Act 2006 which makes lawful the use of such force as is reasonable to prevent a student
  - 158.1. committing any offence
  - 158.2. causing personal injury to, or damage to the property of, any student (including the student themselves)
  - 158.3. causing damage to College property

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- 158.4. prejudicing the maintenance of good order and discipline at the College whether during a teaching session or otherwise.
159. Physical intervention is not corporal punishment. The law forbids a teacher to use any degree of physical contact which is deliberately intended to punish a student or which is intended to cause pain or injury or humiliation. Reasonable means using no more force than is needed.
160. Section 95 of the Act defines those authorised to use force as follows
- 160.1. any teacher who works at the school
  - 160.2. any other person whom the Headteacher has authorised to have control or charge of the students, including but not limited to support staff, teaching assistants and lunchtime supervisors
  - 160.3. paid members of staff whose job does not normally involve supervising students including office staff and the caretaker
  - 160.4. unpaid volunteers such as parents accompanying students on a school trip.
161. Physical intervention must only be used when the student is under the lawful control of a member of staff. It should be noted that Holyport College students who are attending other establishments as part of a partnership arrangement will be subject to that establishment's Care, Control and Physical Intervention Policy. Similarly, students from other establishments attending Holyport College become subject to the College's policy.
162. In determining whether or not to intervene physically, the following should be considered
- 162.1. the seriousness of the incident, assessed by the effect of the injury, damage or disorder which is likely if force is not used
  - 162.2. whether there is a chance of achieving the desired result by any other means
  - 162.3. the relative risk associated with physical intervention compared to using any other strategy
163. Physical intervention should be used only as a last resort when all other attempts to manage a student have failed and every other approach has been considered. Practical methods to de-escalate the situation could include keeping calm, offering verbal prompts, guiding, steering or containment and retreat if this can be done without compromising the safety of others.
164. Help from another adult should also be sought by sending a student to the nearest classroom. Removing other students who may be at risk of harm from the area should be a priority.
165. Any decision to use physical intervention should take into account the student's age, understanding and any SEN or disability. A student with SEN whose behaviour may increase the potential to use physical intervention will have a Risk Assessment or Positive Handling Plan already in place. This will detail strategies and techniques on how to best manage that particular student.
166. Before intervening physically a member of staff should

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- 166.1. tell the student that they are misbehaving
  - 166.2. tell the student to stop misbehaving
  - 166.3. wherever possible, warn the student that physical intervention may be necessary
167. During a physical intervention, a member of staff should
- 167.1. continue to talk with the student throughout the incident
  - 167.2. make clear that physical contact will stop when it ceases to be necessary
  - 167.3. retain a calm and measured approach
  - 167.4. not give the impression of loss of temper or that action is being taken out of anger, frustration or a need to punish the student
168. Physical intervention can involve
- 168.1. coming between students
  - 168.2. blocking a student's path
  - 168.3. using an open palm and leading the student by an elbow placed between thumb and forefinger
  - 168.4. leading (not gripping) a student by the hand or arm
  - 168.5. shepherding a student away by gently taking hold of their elbow or both upper arms
  - 168.6. and in extreme circumstances, more restrictive holds
169. On no account should a member of staff act in a way that would be likely to cause injury, for example by
- 169.1. holding a student around the neck, by the collar or in a way that might restrict breathing
  - 169.2. slapping, punching or kicking a student
  - 169.3. twisting or forcing limbs against a joint
  - 169.4. tripping up a student
  - 169.5. holding or pulling by the hair or ear
  - 169.6. holding a student face down on the ground
170. Where an incident that has required physical intervention occurs, this must be reported immediately to the Head and a full contemporaneous file note prepared. This must be done even if there is no subsequent action taken or complaint filed.
171. The file note should comment on
- 171.1. the circumstances leading up to the incident
  - 171.2. the strategies that were used to try to diffuse the incident
  - 171.3. the nature of the danger to staff or students; • why physical intervention was considered necessary
  - 171.4. the nature and duration of the physical intervention used
  - 171.5. the outcome of the incident
  - 171.6. the names of witnesses.

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172. Parents will routinely be informed of any such incident. Wherever possible this will be done orally by the Head and then confirmed in writing. The Governing Board will be informed of the incident, but not the details of students and staff involved.
173. A member of staff who has been assaulted may wish to consider reporting the matter to the police.
174. A First Aider if required will give first aid and medical support immediately. The school staff will give emotional support for other students individually. A member of staff can request that support is provided should they require it.
175. For students whose behaviour is associated with SEN and/or disabilities appropriate support arrangements would be made involving their parents in the setting up of an individual behaviour plan. This plan would include strategies to prevent and deal with any recurrence of the behaviour that could lead to the use of force.
176. Staff must always avoid touching or holding a student in a way that might be considered indecent. Any form of touch, whether for comfort or congratulation should be from the side with the student's permission and in the presence of others.
177. Training will take place in College for all staff and others that have contact with students. Specialised training will be given to those members of staff dealing with students who are at high risk of requiring physical interventions.

## Adults in College Accommodation

178. In order to comply with the Boarding Schools National Minimum Standards, the Governors are required to have a policy to ensure that any adult (which for this purpose means a person over 16 years of age) whether or not they are employed by the College but living in College accommodation does not pose a risk to children. This is achieved in four ways
  - 178.1. the written declaration, agreeing to adhere to the terms of the Licence to Occupy and the Code of Conduct for Staff and Volunteers, and disclosing any criminal record
  - 178.2. DBS checks
  - 178.3. terms of residential accommodation
  - 178.4. the code of conduct for staff and volunteers
  - 178.5. The Annual Declaration, a form which all members of staff (resident or not) and adults resident in College accommodation must complete declaring any criminal convictions or cautions received in the previous year
179. Young people living in College accommodation will be asked to sign the written declaration as soon as they reach the age of 16 if they are not on the College roll

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180. Adults not employed by the College but who will be living in College accommodation with a newly appointed resident member of staff will be asked to sign the written declaration before appointment of the resident employee is confirmed.
181. Adults not employed by the College but who wish to live in College accommodation with an appointed resident member of staff will be asked to sign the written declaration before the occupancy takes place.
182. All such adults living in College accommodation, whether or not employed by the College, are required to successfully complete a Disclosure and Barring Service check either before taking up residence or on reaching the age of 16, unless they are on roll at the College.
183. In the event that any adult living in College accommodation is subsequently convicted of a criminal offence, or has accepted a caution in respect of an offence, the adult must report the fact to the Headteacher without delay. The Headteacher will decide whether the severity and nature of the offence is such as to compromise the continuation of occupancy in the residence.
184. All adults living in College accommodation are required to adhere to the terms of the residential licence that has been signed by the residential licence holder in respect of their occupancy of the accommodation. This includes the provision that the residential licence may be terminated where the Headteacher reasonably considers that a member of the household of the licence holder may pose a safeguarding risk to children.
185. All adults living in College accommodation are required to act in accordance with the Code of Conduct for Staff and Volunteers as far as their occupation of school accommodation is concerned, whether or not they are employed by the College.

## Safer Working Practices

186. Staff must always be mindful of the fact that they hold a position of trust, and that their behaviour towards students in their charge must be above reproach. The guidance below is not intended to detract from the enriching experiences students gain from positive interaction with staff.  
  
As far as possible, staff should conduct such interviews in a room with visual access, or with an open door.
187. Where such conditions cannot apply, staff are advised to ensure that another adult knows that the interview is taking place. It may be necessary to use a sign indicating that the room is in use, but it is not advisable to use signs prohibiting entry to the room.
188. Where possible, another student or (preferably) another adult should be present or nearby during the interview.

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189. Staff should not transport students in their own cars unless they have adequate insurance and a member of the senior team is aware of this. Staff should, in as far as it is possible, minimise the amount of time they are alone with students in a vehicle.
190. Staff should ensure that their relationships with students are appropriate to the age, maturity and gender of students, taking care that their conduct does not give rise to comment or speculation. Attitudes, demeanour and language all require care and thought, particularly when staff are dealing with adolescent boys and girls.
191. Any behaviour which could be considered flirtatious or sexually provocative could be viewed as an abuse of trust and grooming and result in a referral to the LADO.
192. Any sexual relationships between a member of staff and a student at the College constitutes a criminal offence even if the student is otherwise old enough to give consent.
193. Where a member of staff feels that something they have said or done may be misinterpreted by a student, it is always better to self-report.
194. It would be impossible and inappropriate to lay down hard and fast rules to cover all the circumstances in which staff interrelate with children and young people, or where opportunities for their conduct to be misconstrued might occur. From time to time, however, it is prudent for all staff to reappraise their teaching styles, relationships with young people and their manner and approach to individual young people, to ensure that they give no grounds for doubt about their intentions, in the minds of colleagues, of young people or parents / guardians.
195. In all circumstances employees' professional judgement will be exercised and for the vast majority of employees this guidance will serve only to confirm what has always been their practice. If employees have any doubts about points in this guidance, or how they should act in particular circumstances, they should consult their Line Manager or the Designated Senior Lead.
196. Staff should not consume or be under the influence of alcohol or any substance, including prescription medication, which may affect their ability to care for children.

## **Volunteer Protocol and Code of Conduct**

197. At Holyport College, we recognise and value the effort taken by parents and other volunteers who contribute towards College activities. We encourage your assistance and acknowledge that many College activities are enhanced with your help.
198. We aim to make sure that your time spent in school is productive and enjoyable. The deployment of any volunteer, whether for one day or for a number of sessions over a longer period, must take account of the needs of students and the staff to whom they are assigned. We have a duty to ensure that the welfare of students is promoted and they are safeguarded from harm.

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199. Our volunteers include

- 199.1. parents and guardians of our students
- 199.2. family members of our staff
- 199.3. ex-members of staff
- 199.4. members of the governing body
- 199.5. members of the local community

200. Your main contacts in the school are

- 200.1. the Headteacher
- 200.2. the class teacher
- 200.3. the member of College staff leading the activity

201. Activities that volunteers are engaged in might include

- 201.1. College visits, trips and sports fixtures
- 201.2. class based activities
- 201.3. workshops for which the volunteer has specific training or expertise
- 201.4. careers advice
- 201.5. support for musical or theatrical performances.

202. From time to time, staff may seek the assistance of a volunteer to help with specific tasks, or the Headteacher may agree to allow individuals into the College on a voluntary basis for work experience. In all cases, volunteers must be sufficiently briefed on their role and supplied with a Code of Conduct for Staff and Volunteers, a copy of Part One of 'Keeping Children safe in Education ' and be directed to the Child Protection and Safeguarding Policy on the College website.

203. Under no circumstances should a volunteer in respect of whom no checks have been obtained be left unsupervised or allowed to work in regulated activity.

204. For new volunteers undertaking regulated activity the College must obtain an enhanced DBS certificate with barred list check before the volunteer commences their role. From 1<sup>st</sup> September 2026, whether a volunteer is supervised is no longer determinative of whether they are undertaking regulated activity.

205. For new volunteers not in regulated activity the College may obtain an enhanced DBS certificate. If the volunteer is recruited by another organisation to work in a school, for instance, sports coaches from a local club, the school may ask for written assurance from the organisation that the person has been properly vetted as part of its risk assessment procedures.

206. A register of volunteers must be kept which includes the dates on which they were in attendance at College activities. The designated sponsor should ensure this is done.

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207. All volunteers should have a designated sponsor on the permanent staff of the College and this member of staff has supervisory responsibility for the volunteer at all times. It is the responsibility of the sponsor member of staff to ensure that the volunteer applies for an Enhanced Disclosure from the Disclosure and Barring Service, through the College HR Office, where necessary.
208. In some exceptional circumstances, but never where intimate or overnight care is involved, the Headteacher may agree to accept a DBS that has been obtained from another organisation, in lieu of processing a new DBS request. In order for the Headteacher to agree this the following criteria should be met
- 208.1. a risk assessment has been carried out taking into account the nature of the work to be undertaken at the College, what is already known about the volunteer by the College and whether the volunteer has other employment or undertakes voluntary activities where referees can advise on suitability
  - 208.2. the existing DBS must be an Enhanced DBS and must be less than 12 months old
  - 208.3. the existing DBS should be from an organisation directly relevant to the type of role the volunteer wishes to fill in the College
  - 208.4. the volunteer must provide details of 2 referees and references should be requested and received before the volunteer starts
  - 208.5. the volunteer should provide proof of identity, by production of 2 identity documents
  - 208.6. the volunteer must consent to the College making contact with the originating organisation of the existing DBS.
  - 208.7. In the case of students staying with host families, the College will provide a declaration to the parents of the visiting student stating that it knows of no reason as to why a visiting student should not stay at the proposed address. An enhanced DBS check with barred list check is necessary as overnight care is regulated activity.
  - 208.8. Governors are volunteers and, as such, an enhanced DBS check with barred list check will only be requested if a governor will be engaged in regulated activity.
  - 208.9. An enhanced DBS check without barred list check will be requested as part of the appointment process for governors.
209. Regulated activity includes:
- 209.1. teaching, training, instructing, caring for or supervising children where the activity is carried out frequently, on more than three days in any thirty-day period, or overnight
  - 209.2. work for a limited range of establishments (known as 'specified places', which include schools and colleges), with the opportunity for contact with children, but not including work done by supervised volunteers
  - 209.3. work under the above two points is regulated activity only if done regularly.
210. Some activities are always regulated activities, regardless of their frequency or whether they are supervised or not. This includes
- 210.1. relevant personal care, or health care provided by or provided under the supervision of a health care professional

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- 210.2. personal care includes helping a child, for reasons of age, illness or disability, with eating or drinking, or in connection with toileting, washing, bathing and dressing
- 210.3. health care means care for children provided by, or under the direction or supervision of, a regulated health care professional.
211. All staff, visitors and volunteers are required to be identified and easily located at all times.
212. Volunteers are required to comply with the College's Health and Safety Policy (available on the College website). They should be made aware of emergency procedures (e.g. evacuation) and safety aspects of being involved in a particular task, the associated risk assessment and the College staff member responsible for the activity and students.
213. Any potential hazard which you may feel might put people at risk of injury or harm must be reported straight away to the responsible staff member. Any premises related issue should be reported to the bursar / site manager.
214. Volunteers are required to inform the school, before 8.00 a.m., if they are unable to attend. If called away in the event of an emergency while volunteering, please let the responsible staff member or College office know before you leave the premises.
215. Volunteers are reminded that all information on individual students and members of staff is confidential and that the sharing of data is protected under GDPR. They are not permitted to discuss children's or staff member's issues with other professionals in the school. Volunteers who break this confidentiality rule will be asked to leave.
216. There may be instances where volunteers must pass information to the Headteacher or class teacher. These include incidents where the student is being bullied or discloses he or she is being harmed in any way. Volunteers are advised to inform the responsible staff member as soon as possible and that the College, not the volunteer, will report this to the parents / guardians.
217. Volunteers are expected to behave in an ethical and lawful manner with regard to the use of the internet and emails. Care and attention should be taken while using social networking sites. Use of these sites should not involve communication regarding your employment at this school or any activities which may bring the College into disrepute and / or may cause us to question your suitability to work with children.
218. Volunteers are required to adhere to the same ICT acceptable use policy as staff.
219. Volunteers must not attempt to contact students via social media or email, or make arrangements to meet outside of College.
220. At Holyport College, we do not tolerate discrimination on the grounds of age, disability, race, ethnic background, colour, religion, gender, sexual orientation or marital, social or financial status. All volunteers are required to make a commitment to the College's Equality policy (available on our website) and treat everyone with respect at all times.

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## Code of Conduct for Staff and Volunteers

221. The College has a separate Code of Conduct for Staff and Volunteers. Please refer to this policy.

## Transfer of Child Protection Files

Where a child transfers to another school, college, alternative provision or other educational setting, the College will ensure that safeguarding information is shared appropriately to support a safe transition and continuity of support.

The Designated Safeguarding Lead (DSL), or an appropriate member of the safeguarding team acting on their behalf, will ensure that:

- Child protection records are transferred securely and separately from the main pupil file.
- Child protection files are transferred as soon as possible and within five working days of an in-year transfer, or within the first five working days of the start of a new term.
- Confirmation of receipt of the safeguarding file is obtained from the receiving setting and recorded by the College.
- Relevant safeguarding information is shared with the receiving setting in advance of the pupil's start date where this would support the child's safety, welfare, educational outcomes or the safety of others.
- Where appropriate, a discussion takes place between the DSL and the receiving setting's DSL to ensure that safeguarding concerns, vulnerabilities, risks and protective measures are fully understood and appropriate support is in place when the child starts.
- Particular consideration will be given to children who have, or have previously had, a social worker, children in care, previously looked after children, those subject to Child in Need or Child Protection plans, children vulnerable to exploitation, serious violence, harmful sexual behaviour or radicalisation, and those receiving support through the Channel programme.
- Where a pupil transfers to a further education provider, sixth form college, alternative provision or other post-16 setting, relevant safeguarding information will be shared with the receiving institution's designated safeguarding lead or equivalent safeguarding professional.

The College recognises that a lack of information about a child's circumstances can adversely affect their safety, welfare and educational outcomes. Appropriate information sharing is therefore an essential part of safeguarding and promoting the welfare of children.

## Safer Recruitment

222. In order to ensure that fair and effective arrangements exist for the appointment of staff, the following procedures shall be employed to ensure that

- 222.1. the most suitable applicant is appointed to each vacant post, having regard to the real needs of the job
- 222.2. equal opportunities are provided for all applicants
- 222.3. legal obligations are met
- 222.4. good employment practice is followed
- 222.5. arrangements to ensure the safeguarding of children and vulnerable adults are in place.

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223. This procedure shall apply to the appointment of all teaching and non-teaching staff who are employed at Holyport College.
224. The following legislation applies in relation to this Policy
- 224.1. Education Act 2002 – specifically relating to Prohibition Orders
  - 224.2. Equality Act 2010
  - 224.3. Safeguarding Vulnerable Groups 2006 as amended by the Protection of Freedoms Act 2012
  - 224.4. The Independent Educational Provision in England (Prohibition on Participation in Management) Regulations 2012
225. External posts are advertised on the College website and other appropriate media and always contain a safeguarding statement.
226. Advertisements give brief details of the College, the post, salary level, brief details of the person specification, address for application form and further details and a closing date which shall give sufficient time for potential applicants to receive the application form and further details and

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prepare an application. Advertisements will state that Holyport College is an equal opportunities employer.

227. The College has a policy of making gender specific appointments in boarding houses. Accordingly S.7 (2)(e) SDA is to be inserted in advertisements for such appointments.
228. Except as provided in Para 218 above, advertisements shall be worded in a non-discriminatory form, using both masculine and feminine pronouns so that no individual group is disadvantaged from making an application, except where gender specific appointments are provided for in policy.
229. All persons expressing an interest in a vacant post shall have access to a recruitment pack containing the following information
  - 229.1. a standard non-discriminatory application form
  - 229.2. a job description and person specification for the post
  - 229.3. information on the College and the department, as appropriate; and
  - 229.4. an ethnic monitoring form.
230. Unsuccessful applicants shall always receive acknowledgement of their application and written confirmation if they are unsuccessful.
231. Shortlisting and interviewing will be carried out on the basis of the person specification and each candidate will be assessed on how well he or she meets the criteria stated.
232. Once shortlisting has been completed, the College will conduct due-diligence internet searches on shortlisted candidates. Only information which may raise safeguarding concerns is of interest and these searches will enable the interview panel to discuss any concerns at interview.
233. The College will request 2 references for all shortlisted candidates, prior to interview. Where possible, the references should be received and available to the interview panel Chair prior to interview so that any concerns in the reference may be discussed and to aid the final decision on appointment.
234. Reference requests will be made in a standard format for all candidates and will specifically ask for any known reason why the person should not be employed to work with children and state that there should be no material mis-statement or omission relevant to the suitability of the applicant.
235. All successful appointments must be subject to
  - 235.1. at least two written references, including one from the most recent employer, received on headed paper or from an official email address
  - 235.2. the College will contact referees to verify the references
  - 235.3. all applicants must supply a full employment history with any gaps in employment being explained appropriately.

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236. While offers of employment may be made conditionally on two satisfactory references being provided, new employees should not normally commence duties without these references having been provided in writing and deemed to be satisfactory by the College.
237. In exceptional circumstances, the Headteacher may agree to a new employee starting work before both references are received. However, this should only be agreed if the new employee has satisfactorily completed an Enhanced DBS disclosure. In such cases, references should be obtained as soon as possible. A risk assessment will also be put in place.
238. The Headteacher (or nominated representative) shall determine the arrangements for interview, including which member of the interview panel shall act as Chair. The interview panel will include at least one member who has completed approved Safer Recruitment training and will decide in advance the topics to be covered by questioning during the interview, which shall test the shortlisted candidate against the criteria in the person specification. A safeguarding question must always be asked and the candidate's motivation for wanting to work with children should be assessed. Interviewers should also bear in mind their responsibilities under the Prevent Duty. In particular, care should be taken to ensure no questions of a discriminatory nature are asked.
239. All candidates interviewed shall be asked the same core questions to ensure fairness and equality. Supplementary questions may be asked on the basis of a candidate's response, in order to develop a particular topic or allow a candidate to supply more information. The interview panel must question the candidate where they have indicated gaps in employment history on their application form.
240. When an appointment is dependent on specific qualifications, the applicant is to be asked to provide evidence of the qualification(s) at interview, either through supply of an original certificate or through a certified copy. If there is any doubt as to the validity of the qualification, checks must be made with the awarding authority. The Teachers' Services System is used to verify QTS and the completion of the teacher induction.
241. The applicant must also provide photographic proof of identification, such as a passport or driving licence, at interview. The right to work in the United Kingdom should also be confirmed at interview.
242. At the close of interviews the panel members shall discuss their individual assessments of each candidate and make their appointment decision. For boarding positions, the panel must particularly satisfy itself that the recommended candidate is suitable for a residential or boarding role.
243. A record shall be made of the reasons for selection or rejection of each candidate. These notes, including shortlisting information, individual panel member's notes, together with application forms, interview assessment forms (if applicable), reference material, job description and person specification shall be held on the personnel file of the appointed candidate(s). Information on unsuccessful candidates will be held for a maximum of six months from the effective date of appointment.

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244. Candidates shall be informed of the results of the interview at the earliest possible opportunity and written confirmation of the conditional offer of employment sent to the successful candidate.
245. The successful candidate should receive a verbal offer of the position as soon as possible and normally within 48 hours of the interview. If the position is verbally accepted, written confirmation of the offer of employment should follow with the minimum of delay. This written offer of employment will provide for a probationary period to be served as appropriate. All offers of employment are to be conditional, subject to satisfactory references and satisfactory clearance being obtained from the Disclosure and Barring Service.
246. The appointments panel are to treat disabled interviewees in the same way as all other interviewees. Due consideration should be given to the location of the interview to ensure equality with other candidates. The applicant needs to be fully informed of what the job entails. At the end of the interview, it may be appropriate to discuss what reasonable adjustments may be needed where the individual's disability is relevant to the post being applied for.
247. Enhanced DBS Disclosures (with barred list check and, for teachers, a prohibition list check) are carried out for all new employees as soon as the applicant is successful at interview. For applicants who have lived overseas, the College will use its reasonable endeavours to obtain a criminal record disclosure from the relevant country/countries. Where this information is not available, the College will seek alternative measures of checking suitability, including checking with Teaching Councils and other regulatory bodies, and/or undertake a risk assessment that supports informed decision making on whether or not to proceed with the appointment. The College will make use of the guidance on criminal records checks for overseas applicants which is available on GOV.UK. The applicant may have to arrange and pay for these various checks as many overseas agencies will not deal directly with third parties.
248. If the appointee has lived outside the United Kingdom, further checks to establish suitability to work with children (such as a certificate of good conduct from the country or countries they have been living in) will be required. There is no requirement to obtain an enhanced DBS certificate or carry out checks for events that may have occurred outside the UK if, during a period which ended not more than three months before the person's appointment, the applicant has worked in a school in England, a 16-19 academy or within the further education sector in a post which brought the person into regular contact with children or young people.
249. There is no legal requirement to update DBS certificates for staff on a regular basis. Nevertheless, the College does require those who work in residential provision or in the safeguarding team to renew their DBS every 3 years.
250. College staff, volunteers and residents are reminded that they must disclose to the Headteacher any cautions or convictions which arise during the course of their employment. This will be referred to the DBS. Where the College has concerns about an existing member of staff's suitability to work with children, it may carry out all relevant checks as if the person was a new member of staff.

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251. A section 128 direction prohibits or restricts a person from taking part in the management of free schools. A person who is prohibited cannot hold a management or governance position in a free school. Checks will be made to ensure that an individual is not subject to a section 128 direction made by the Secretary of State.
252. No one can start any regulated activity under any circumstances unless, as an absolute minimum, a barred list check has been obtained and a risk assessment completed.
253. The DBS cannot provide barred list information on any person, including volunteers, who are not seeking to enter into regulated activity.
254. The College uses the DBS update service where applicable and with the applicant's consent.
255. The College's Human Resources Office maintains a central database of all DBS disclosures. The successful applicant's details will be placed on the database once enhanced clearance has been received by the College.
256. The Single Central Register (SCR) contains:
  - 256.1. an identity check
  - 256.2. a barred list check
  - 256.3. an enhanced DBS check/certificate
  - 256.4. a prohibition form teaching check
  - 256.5. a section 128 check (for management positions in a free school)
  - 256.6. further checks on people living or working outside the UK; this would include recording checks for EEA teachers with sanctions and restrictions; • a check of professional qualifications; and • a check to establish the person's right to work in the UK
257. In exceptional circumstances, it may be appropriate for new staff to start work before the Enhanced DBS disclosure is received. When deemed appropriate, the following criteria must be met, in order for a new employee to start work in a regulated capacity without a satisfactorily completed DBS
  - 257.1. the Headteacher must be made aware and agree
  - 257.2. the DBS application must have been completed and be in progress
  - 257.3. a barred list check must have been made
  - 257.4. two appropriate and satisfactory references must have been received
  - 257.5. the new employee's line manager must be made aware and provide adequate supervision
  - 257.6. the employee should at no time be alone with students
  - 257.7. the employee must have no access to students' bedrooms, bathrooms or changing areas
  - 257.8. In the event of any concern being raised by the line manager, other staff or students, before the DBS certificate is received, the employee is to be immediately suspended from their duties.

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258. New employees that have been offered residential accommodation are not to take up residence without a satisfactory Enhanced DBS and barred list check being completed and the requirements of the College's Licence to Occupy are to be met for all members of the household over the age of 16, not employed or on-roll of the College.
259. Family members of residential staff cannot take up residence until their DBS certificate is received.
260. The College requires all employees to sign an annual DBS declaration declaring whether or not they have received a criminal conviction or caution in the previous year.
261. The College may, if considered appropriate by the Headteacher and in line with legislation, require a new DBS check (at the appropriate level) to be undertaken for any person who may come into contact with students, including employees, contractors and volunteers.
262. Although there is no legal requirement to do so, the College requires a full DBS certificate every 3 years of service for those who work in residential provision or in the safeguarding team.
263. In addition to its own employees, the College may use other contractors, who may come into occasional contact with students. Where contractors are to be engaged in regulated activity, the College requires an enhanced DBS disclosure with barred list checks. Where the contractor is self-employed, the College may facilitate the process of obtaining a new DBS. This applies, but is not limited to, contractors engaged to run co-curricular clubs, peripatetic music tuition or provide education, mentoring and counselling to students.
264. Where contractors do not engage in regulated activity, but their work provides the opportunity for contact with students, the contractor requires an enhanced DBS disclosure without barred list checks, or to be accompanied at all times by an appropriate person for whom an enhanced DBS check is held.
265. Contractors undertaking work for the College on a one-off, ad hoc or occasional basis are accompanied by a member of College staff while on the premises.
266. Contractors are not permitted to enter the boarding houses at any time except under the supervision of an appropriate member of College staff and in any case only when the boarding students are not present (e.g. during the College day or during College closures).
267. Boarders are always informed when a contractor will be working in a boarding house.
268. If the College knows or has reason to believe that an individual is barred, it commits an offence if it allows the individual to carry out any form of regulated activity. There are penalties of up to five years in prison if a barred individual is convicted of attempting to engage in or engaging in such work.

## **Use of school site by outside organisations**

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269. From time to time, outside organisations such as sports or community groups may use the College's premises. The College will follow its own Child Protection policy if an allegation is made relating to an incident when an individual or organisation was using its premises, regardless of whether it involved a student enrolled in the College or not.

## Overseas Exchanges

270. In England, all teaching and boarding staff in schools are checked as to their suitability to work with young people. This process includes a check for any criminal record. When College families host a young person from another school, say on a foreign exchange or sports trip, this could amount to regulated activity and any host family member over the age of 16 and not a student at the College will need an enhanced DBS and barred list check.
271. Where the parents make the arrangements themselves, this is a private matter and the College is not the regulated activity provider.
272. Hosting for longer than 28 nights may constitute private fostering and the local authority will be informed.
273. Such arrangements do not exist overseas and the College will seek reassurances from overseas schools that they have exercised due diligence in selecting families for our students.
274. Parents/guardians will be asked to confirm their understanding of the homestay arrangements and to give consent for their child to take part in the overseas exchange. Completed forms should be returned to the teacher in charge of the exchange at least one month before departure.
275. The College will take reasonable steps, in line with statutory safeguarding guidance, to seek assurances from the partner school about the suitability of host families overseas. Parents/guardians acknowledge that safeguarding checks overseas cannot be equivalent to UK DBS checks, but will confirm that they are satisfied with the arrangements made and consent to their child staying with a host family selected by the partner school. The College's Designated Safeguarding Lead will be consulted as part of this process and retains oversight of the safeguarding arrangements.

Policy revision dates:

| Revision No | Effective Date                 | Summary of Revision | Reviewed By | Approved By |
|-------------|--------------------------------|---------------------|-------------|-------------|
| V1.0        | 12 <sup>th</sup> May 2014      |                     |             | Governors   |
| V1.1        | 26 <sup>th</sup> February 2015 |                     | SLT         | Governors   |
| V1.2        | 10 <sup>th</sup> November 2015 |                     | SLT         | Governors   |
| V1.3        | 1 <sup>st</sup> September 2016 |                     | SLT         | Governors   |



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|------|--------------------------------|--------------------------------------------|---------|-----------|
| V1.4 | 1 <sup>st</sup> October 2017   |                                            | SLT     | Governors |
| V1.5 | 1 <sup>st</sup> September 2018 |                                            | SLT     | Governors |
| V1.6 | 26 <sup>th</sup> April 2019    |                                            | SLT     | Governors |
| V1.7 | 1 <sup>st</sup> September 2019 |                                            | SLT     | Governors |
| V1.8 | 1 <sup>st</sup> September 2020 |                                            | SLT     | Governors |
| V1.9 | 1 <sup>st</sup> October 2020   |                                            | SLT     | Governors |
| V2.0 | 18 <sup>th</sup> March 2021    | Post Brexit recruitment amendment para 110 | SLT GWC | Governors |
| V2.1 | 1 <sup>st</sup> September 2021 | To update in line with KCSIE Sept 2021     | SLT     | Governors |
| V2.2 | 1 <sup>st</sup> September 2022 | To update in line with KCSIE Sept 2022     | SLT     | Governors |
| V2.3 | 1 <sup>st</sup> September 2023 | To update in line with KCSIE Sept 2023     | SLT     | Governors |
| V2.4 | 1 <sup>st</sup> September 2024 | To update in line with KCSIE 2024          | SLT     | Governors |
| V2.5 | 1 <sup>st</sup> September 2025 | To update in line with KCSIE 2025          | SLT     | Governors |