



Sidcot
Live Adventurously

Policy Name: Child Protection and Safeguarding Policy

Policy Number: 2.1

Date: 10 October 2020

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1. Overarching Statements

- 1.1 The Governing Body and Senior Leadership Team of Sidcot School fully recognise their responsibilities under the Acts, Regulations and Guidance listed in Appendix 5 of this policy to safeguard and promote the welfare of children and to work together with other agencies to ensure adequate arrangements within the School to identify, assess and support those children who are at risk of suffering harm or who are suffering harm or in need of help. Safeguarding is everyone's responsibility. The School has a culture of safety, equality and protection which enables issues about safeguarding and child welfare to be addressed.
- 1.2 This policy aims to ensure that all staff are alert to the signs of abuse and neglect, and that they are familiar with the procedures as to how to report any concerns. It aims to raise awareness of individual responsibilities and to provide a means of monitoring, recording and reporting cases of abuse.
- 1.3 When concerned about the welfare of a child, the best interests of the child and the best possible outcome for the child will always be the priority. Children are listened to.
- 1.4 It is a key role of the School to support children and provide stability in the lives of children who may be at risk of harm. It is also recognised that students can be vulnerable and exploited by others. Staff will be alert to the signs of vulnerability and/or susceptibilities to any extremist indoctrination.

1.5 Key contacts:

Designated Safeguarding Lead (DSL):

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(Deputy Head Pastoral) 07471 900 671

Deputy Designated Safeguarding Lead:

Veronika Chidemo veronika.chidemo@sidcot.org.uk 01934 843102
(Assistant Head Pastoral) 07471 900 649

Deputy Designated Safeguarding Lead – Junior School including Early Years

Natalie Bone natalie.bone@sidcot.org.uk 01934 845200
01934 845271 / Etn 401

Deputy Designated Safeguarding Lead – Junior School including Early Years

Cath Dykes cath.dykes@sidcot.org.uk 01934 845200
Head of Early Years

Designated Safeguarding Governor:

Julie Cook Julie.cook@sidcot.org.uk 07980 222004

Chair of Governors

Rosemary Carr rosemary.carr@sidcot.org.uk 07836 786622

Headmaster

Iain Kilpatrick iain.kilpatrick@sidcot.org.uk 01934 845216
07545 702496

- 1.6 In addition the School has appointed a number of staff (listed in paragraph 1.8 below) to act as Assistant Designated Persons to ensure that the whole campus is covered at all times by at least one person who has undertaken the necessary training and is known to staff and children in the role of a designated person.
- 1.7 All safeguarding matters must be ultimately directed to the DSL. She takes the lead role in all safeguarding matters throughout the School (Senior, Junior and Out of School Care and Activities). She has two deputies who assist and who are available in the Senior School and Junior School. The Assistant Designated Persons listed in paragraph 1.8 below are available in key areas away from the Senior School and can take immediate action in the absence of the DSL and her deputies. Any matters dealt with by Assistant Designated Persons will be reported fully to the DSL as soon as possible. All the above persons and the Headmaster have undergone the appropriate training.
- 1.8 The names of the team are clearly displayed on posters around the School and are printed on school literature – for example the Blue Book, and on the website. During periods when senior students are learning remotely due to the Covid-19 pandemic, they are able to contact any of the safeguarding team via the online learning platform “Teams.”

Name and Role of Assistant Designated Persons	Availability
Emma Webster Holiday Club and Out of School Manager	Holiday periods and after school activities
Rosanna Dawes Sports Centre	Term time

2. To Whom does this Policy apply, and where does it apply?

- 2.1 This policy applies to **all staff** in the School (which includes any person working at the School whether under a contract of employment or contract of services, supply staff, governors and volunteers) and to all children enrolled at the School. Organisations working with children hiring the School’s facilities may adopt this policy on school

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- premises in preference to their own, but must notify the School which policy they are following as per the hiring and lettings policy.
- 2.2 All staff have a responsibility to provide a safe environment within which children can learn and reach their full potential whilst identifying children who may be in need of early help or who are suffering, or are likely to suffer, significant harm. All staff should work with other services as needed by sharing concerns and taking prompt action.
- 2.3 The Teacher Standards, DfE, 2013, state that teachers should ‘uphold public trust in the profession and maintain high standards of ethics and behaviour, within and outside School, by...having regard for the need to safeguard students’ well-being, in accordance with statutory provisions’. Sidcot School expects equally high standards of all employees and volunteers.
- 2.4 The legal definition of “children” includes everyone under the age of 18 years. At Sidcot, this definition is extended to include all learners, irrespective of age, who are afforded the rights and protections afforded by this policy. In this policy, the term “child” and “student” are used interchangeably.
- 2.5 The School also recognises that some employees are under the age of 18 and also affords them the rights and protections set out in this policy. Employees also have the full rights afforded under current employment law and may seek recourse to these.
- 2.6 This policy applies wherever staff are working with students – even if they are away from the School – for example on school trips. This policy also applies if an alleged incident has taken place between (two or more) students away from the school premises.
- 2.7 The School recognises that children may be particularly vulnerable in the boarding setting, and early years. Specific guidance which applies to boarding may be found at para 20.3 below and at paragraph 20.4 regarding Early Years. The School is also alert to the fact that certain groups of children may be particularly vulnerable to bullying and peer on peer abuse – for example looked after children, previously looked after children, children with caring responsibilities or those with special educational needs and disabilities (SEND). Children with SEND can face additional safeguarding challenges, for example being socially isolated or unable to communicate well, and may not always show outward signs of distress. Possible indicators of abuse (such as behaviour, mood and injury) may be misunderstood as being related to their disability. Any reports of abuse involving children with SEND will therefore require close liaison with the DSL and her team. The School also recognises that different gender issues can be prevalent when dealing with peer on peer abuse - for example boys being subject to initiation / hazing type violence, girls being subject to upskirting, and that children who are lesbian, gay, bi or trans (LGBT) or perceived to be LGBT may be particularly vulnerable. This policy recognises that abuse could occur from both inside and from outside the School, and could be from an adult or child.
- 2.8 This policy applies equally to all children, irrespective of race, colour, religion or belief, national, ethnic or social origin, gender, gender reassignment, sexual orientation, disability or special educational needs and should be read in conjunction with those policies listed at Appendix 4 with particular reference to the staff student code (staff behaviour policy) (policy 2.2), staff recruitment (9.13) and whistleblowing policy (9.9). Further policies relate to the supervision of staff (and checking of contractor and agency staff) (9.27), the recruitment of governors (9.13a) and the recruitment of volunteers (9.14).
- 2.9 It is recognised that the field of child protection is ever changing and new risks to children will present themselves, particularly given the pace at which technology evolves. The School has developed a Digital Safety Policy (12.1) to address technological risks and

it forms an integral part of the School's suite of safeguarding materials. Child protection will always be a primary consideration when drafting any policy.

- 2.9 Appendix 1 lists some of the indicators and signs of neglect and abuse. All staff must be aware that mental health problems, can, in some cases be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. The School's approach to mental health and the processes to follow are outlined in the Mental Health and Wellbeing policy.
- 2.10 During the time of the pandemic our school will continue to be a safe space for all children to attend and flourish. We will refer to the Government guidance for education and childcare settings on how to implement social distancing and continue to follow the advice from Public Health England on handwashing and other measures to limit the risk of spread of COVID19. The addendum to this policy sets out the provisions that apply in the event of school closure.

3. Safeguarding, Wellbeing and Child Protection

- 3.1 Safeguarding is defined by Working Together 2018 as:
- Protecting children from maltreatment;
 - Preventing impairment of children's mental and physical health or development;
 - Ensuring that children grow up in circumstances consistent with the provision of safe and effective care and
 - Taking action to enable all children to have the best outcomes.
- 3.1.1 The types, definitions and signs of harm that a child may suffer are identified in Appendix 1 of this policy.
- 3.2 Child protection is an element of safeguarding and promoting welfare, and refers to the action that is undertaken to protect specific children who are suffering or are likely to suffer harm.
- 3.3 The School plays a significant part in the prevention of harm to our children by providing good lines of communication with trusted adults, supportive friends and an ethos of protection. Included within this is the emotional wellbeing of children and the role that the School plays in identifying those children who may be vulnerable to radicalisation or exposed to extremist views. The child protection processes outlined in this policy apply to those children who are at risk of being drawn into terrorism.
- 3.4 The School works with North Somerset Safeguarding Children Partnership (contact details in Appendix 3) and follows its procedures. The School has developed effective working relationships with all other agencies involved in safeguarding children such as Social Care, Child and Adolescent Mental Health Services (CAMHS), Education Welfare, Educational Psychology, the Local Chief Officer of Police and voluntary agencies as necessary. Timely, proactive, and open sharing of information between professionals and local agencies is essential for effective identification and assessment of issues and identification of the relevant services to provide support. Early sharing of information is the key to providing effective early help where there are emerging problems. At the other end of the continuum, sharing information can be essential to put in place effective child protection measures. Please refer to section 6 for further information.

4. Management of Safeguarding Including the Appointment of the Designated Safeguarding Lead (DSL)

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- 4.1 The Governing body is ultimately responsible for all matters of Safeguarding and Child Protection. The Governing body appoints the Designated Safeguarding Lead (DSL) for safeguarding and child protection from the Senior Leadership Team (SLT), and at least one Deputy Designated Safeguarding Lead (DDSL). The DSL is a member of the SLT and has the status and authority within the School to carry out the duties of the post including committing resources, developing strategy, organising training and, where appropriate, supporting and directing other staff. She is the primary point of contact in safeguarding matters. The DSL is supported by her team of deputies and assistants.
- 4.2 The DSL may be contacted at any time (or one of her deputies or assistant designated persons in the event of her unavailability) – the boarding staff have emergency contact numbers for the DSL and her deputies in all the boarding houses.
- 4.3 If any person has a concern that a child has suffered harm or is in danger of harm, they should contact the DSL or, in her absence, one of her deputies, and use MyConcern to log the details of their concern. This should be submitted as soon as possible, often immediately, and always within 24 hours of becoming aware of the issue. MyConcern is also the way in which concerns of a less serious nature (but which relate to wellbeing or pastoral care) must be reported. Please refer to paragraph 4.10. Early intervention is key to address risks and prevent issues escalating. This includes allegations of abuse which may involve staff members. Staff should not assume that somebody else will take action, and must share any information appropriately to ensure that a child is kept safe. Staff must familiarise themselves with the whistleblowing policy.
- 4.4 If any staff member is concerned about a child's welfare, health or development but no specific allegation of abuse has been made, they should always discuss their concerns with the DSL.
- 4.5 The DSL will decide whether to contact children's social care and / or the DOFA (Designated Officer for Allegations), but a member of staff can also refer concerns directly to children's social care. Direct referrals should be reported to the DSL as soon as possible thereafter, unless the circumstances at paragraphs 11.4 and 11.5 apply (allegations against the DSL or Headmaster). If in exceptional circumstances the DSL or their deputy is not available, staff should consider speaking to another member of the Senior Leadership Team or an Assistant Designated Person and / or take advice from North Somerset Council's social care team. Any action taken must be shared with the DSL or one of their deputies as soon as is possible.
- 4.6 Full written records of any concerns will be made and kept securely, in the case of prior written records, in paper form by the DSL or Deputy DSLs, but moving forward, electronically on MyConcern, and any paper documents will be uploaded onto MyConcern.
- 4.7 Parents are welcome to approach the DSL if they have any concerns about the welfare of any child in the School, or alternatively may discuss concerns with their child's tutor or head of year.
- 4.8 In the event that contact with social care is necessary, the DSL (or, in her absence, her deputy) will:
- Make records of any discussions with the child, staff or other agencies on MyConcern;
 - Contact the Single Point of Access (SPA) at North Somerset Council to speak to a social worker or the DOFA (if the concerns relate to an adult working with children);
 - Take advice from social care if the case does not appear clear cut in the DSL's mind. This advice may be to continue to monitor the situation or proceed to making a formal referral, in which case the DSL should follow such advice and maintain close contact with the Local Authority. This decision should be communicated to the individual

raising the initial concern unless there is advice to the contrary from social care or other statutory agency.

- Securely store recorded information from Social Service meetings, which will be uploaded securely onto MyConcern, whilst being aware that this material can be requested under the General Data Protection Regulation (GDPR) / Data Protection Act 2018. If an external request is made for this information in a case when abuse is suspected, for example by a parent or guardian, advice will be taken as to whether it is appropriate for this material to be disclosed. This may involve liaison with appropriate statutory agencies;
- Recognise that all matters relating to child protection are confidential, and that personal information about a child will only be disclosed to other members of staff on a need to know basis;
- Inform and liaise with the child's parents or guardian of any intention to inform social care and/or the police of concerns, unless it is suspected that this might place the child at greater risk or jeopardise a police enquiry - the DSL will take advice from social care and the police where appropriate.

4.9 In addition the DSL will:

- Lead on matters of digital safety
- Maintain an overview of safeguarding within the School, adopting a contextual approach to safeguarding which takes account of wider environmental factors which are present in a child's life and which are a threat to their safety or welfare;
- Refer cases, as required, to the Channel programme where there is a radicalisation concern, and support staff who make such referrals;
- Arrange for any cases where a person is dismissed, removed or has left due to risk of harm to a child to be reported to the Disclosure and Barring service as required;
- Support and liaise with other staff as appropriate to keep them apprised of issues, for example the Headmaster or case manager when allegations have been made against staff, and act as a source of support to staff who have made referrals or who are considering doing so;
- Recognise that staff working in the School who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting. The DSL will offer support by providing an opportunity to talk through anxieties with her, or a member of her team, and offer further support as is necessary. This could be provided by, for example, the Headmaster, by Occupational Health and/or a teacher, counsellor or trade union representative as appropriate;
- Monitor the effectiveness of the School's safeguarding and child protection policies and procedures;
- Ensure that any child protection file is securely transferred to a new school or college as soon as possible in the event that a student leaves. In this respect, the School understands and appreciates that the sharing of relevant information with any new school/college is important, and can be vital to support the secure transition of a child.

4.10 The School has a systematic means of monitoring children known or thought to be at risk of harm and ensures that school staff contribute to assessments of need and support plans for those children. Staff can quickly and easily access MyConcern via Firefly or directly via the Internet to inform the DSL and the Assistant Head (Pastoral Care and Wellbeing) of any lower level concerns. Any information is passed directly to the DSL and her deputies. Vulnerable Students will be discussed on a weekly basis with key staff and appropriate support plans put in place. Any students who are deemed to be at high risk of harm are risk assessed in accordance with the School's risk assessment policy to afford extra support and safety measures.

4.11 The role of the DSL in assisting the governors to monitor the effectiveness of the child protection policy and systems is set out at paragraph 19 below.

5. All Staff Members are Expected to:

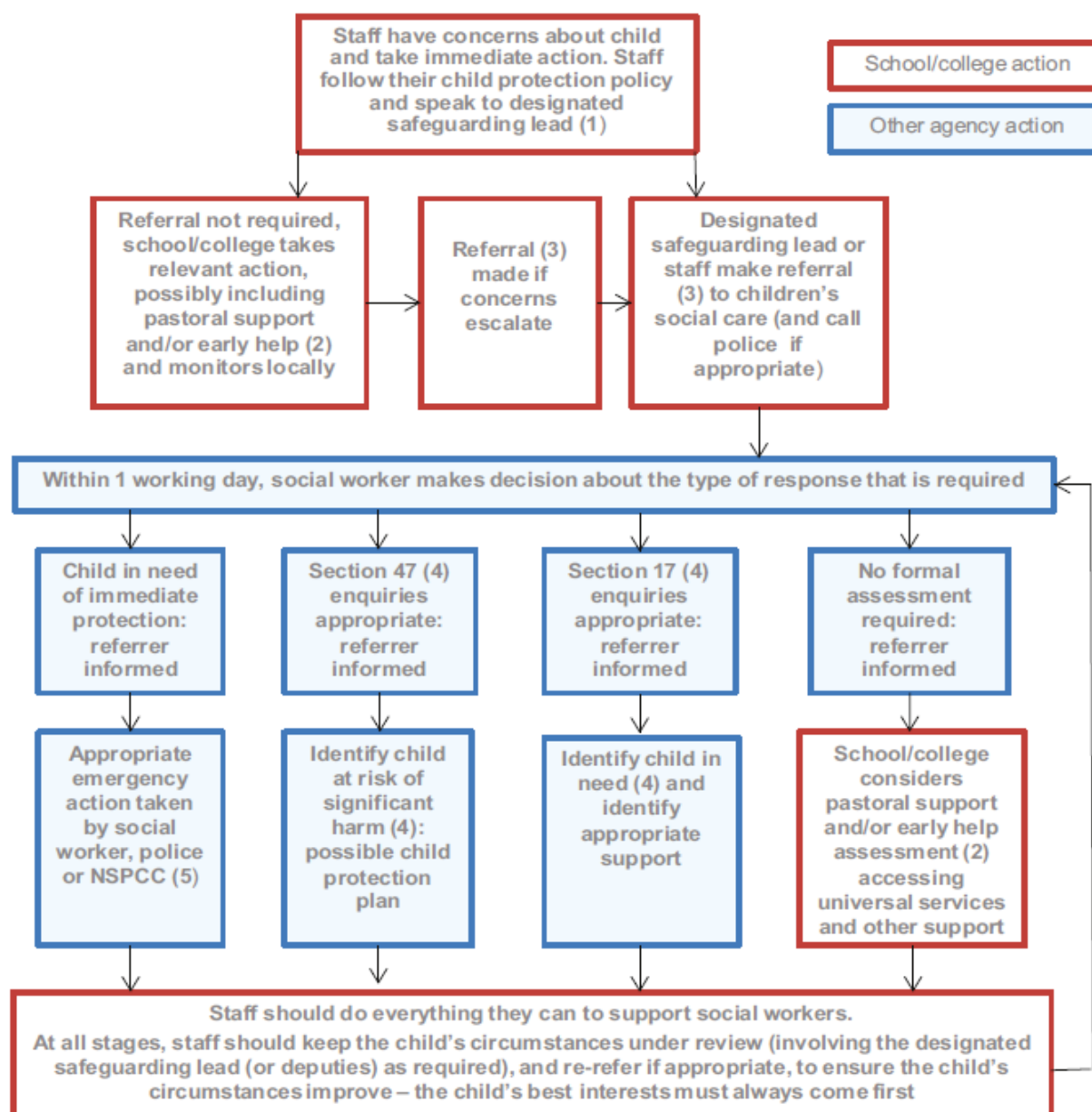
- Adopt a child-centred approach at all times – this means that they should at all times consider what is in the best interests of the child;
- Maintain an attitude that ‘it could happen here’ where safeguarding is concerned;
- Be familiar with, and understand, the content of this policy and the types and signs of abuse and neglect identified in section 10 below and in Appendix 1, so that they are able to identify children who are in need of help or protection. It is essential that staff act on and refer at the earliest signs of abuse and neglect;
- Be aware of the systems within the School to support safeguarding including the response to children who go missing from education;
- Attend their induction where safeguarding and child protection procedures will be explained;
- Know the names of the DSL, and deputies, and where to find the list of members of the team;
- Understand the basic principles of information sharing where relevant and as appropriate;
- Attend regular appropriate training and undertake relevant training as required – updates are provided at least annually – please see paragraph 18;
- Read and understand at least the updated Part 1 of the statutory guidance ‘Keeping Children Safe in Education’, DfE, each year and Annex A if they work directly with children, together with the School’s mandatory safeguarding policies (including missing children), the staff code of conduct and behaviour policies. This is provided as part of the induction process, and is available either in hard copy form or on the staff intranet;
- Be aware of their legal responsibility to report to the police any instances of FGM that may have occurred (this is a personal duty for teachers) – teachers should in the absence of good reason still consider and discuss any cases of FGM with the DSL who should involve social care as appropriate;
- Be aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger;
- Uphold the premise that the School will not tolerate sexual violence or sexual harassment, nor dismiss it simply as "banter", "just having a laugh" or "part of growing up".
- Be aware of the options available for Early Help in appropriate cases (see paragraph 7 below).

6. Information Sharing

6.1 Everyone who comes into contact with children and their families has a role to play in safeguarding children. School staff are particularly important as they are in a position to identify concerns early, and provide help for children to prevent concerns from escalating. The School and its staff form part of the wider safeguarding system of children detailed in the statutory guidance Working Together to Safeguard Children, 2018.

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- 6.2 Care will be taken to ensure that information concerning child protection is given only to the appropriate people on a “need to know” basis. All staff must be aware of issues relating to confidentiality and the status of information they may hold.
 - 6.3 The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children. If in doubt about sharing information, staff should speak to the DSL or a deputy.
 - 6.4 All staff must be aware of the seven golden rules of information sharing which can be found at Appendix 2.
 - 6.5 The DSL will nevertheless take a lead role in determining whether information should be shared on a case-by case basis using their professional judgement, supported by other agencies such as children’s social care. Please see flowchart below.

Actions where there are concerns about a child



6.6 In cases where there are allegations of either sexual violence or sexual harassment between students, the DFE guidance will be followed by the DSL to determine the appropriate course of action be it:

- Internal management
- Early Help
- Referral to children's social care
- Reporting to the police – if the child is less than 10 years of age (the age of criminal responsibility), where a report would be warranted for an older child, the matter will still be reported to the police, who would be expected to adopt a welfare rather than criminal response.

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- 6.7 Parental consent is not required to contact and liaise with social care or other external agencies. It is however the usual practice for the DSL to inform parents, unless this would put the child at risk of suffering further harm or would jeopardise a police investigation. Advice will be taken from appropriate agencies at the time – please refer to appendix 3 for contact details.
- 6.8 If there are concerns about children who are not formally enrolled as Sidcot Students but attend a holiday or sports or other club and these concerns do not meet the threshold for reporting to the Local Authority, but would be entered on MyConcern were they Sidcot students, the school will, in consultation with the DSL, consider whether if it is appropriate for safeguarding reasons to share the concerns with the student's usual school or other agency, and parents where appropriate.

7. Early Help

- 7.1 In cases of children who have not suffered harm, but are in need of additional support, appropriate referrals will be made for inter-agency assessment using Early Help (or common assessment framework – CAF) and team around the child (TAC). Any child may benefit from early help but all staff should be particularly alert to the potential need for early help for any child who:
- is disabled and has specific additional needs;
 - has special educational needs (whether or not they have a statutory education, health and care plan);
 - is a young carer;
 - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
 - is frequently missing/goes missing from care or from home;
 - is at risk of online abuse, grooming, modern slavery, trafficking or exploitation;
 - is at risk of being radicalised or exploited;
 - is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
 - is misusing drugs or alcohol themselves
 - has returned home to their family from care;
 - is a privately fostered child.
- 7.2 The aim of Early Help is to provide support as soon as a problem emerges at any time during a child's life (from EYFS through the teenage years) and to work with parents with their consent.

8. Where Children are at Risk of Suffering or are Suffering Significant Harm (including allegations of abuse)

- 8.1 If, at any point, there is a risk of serious harm to a child, a referral should be made immediately. Any member of staff may do this and, if the child's situation does not appear to be improving, the staff member must press for re-consideration to ensure that the concerns lead to help for the child. Social care should advise within one working day the next steps to be taken and see the child as soon as possible where appropriate.

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- 8.2 As soon as there is an allegation of abuse, there should be no further investigation of the incident prior to immediate consultation within the appropriate statutory agencies – normally social care and the police.
- 8.3 Direct referrals should be reported to the DSL (or one of the deputies or assistants) as soon as possible thereafter, unless the referral relates to an allegation against the DSL in which case it should be referred to the Headmaster, or in his absence the Chair of Governors.
- 8.4 The statutory guidance “Working Together” states, “Once the referral has been accepted by local authority children’s social care, the lead professional role falls to a social worker. The social worker should clarify with the referrer, when known, the nature of the concerns and how and why they have arisen. Within one working day of a referral being received, a local authority social worker should make a decision about the type of response that is required”. This will include determining whether:
- The child requires immediate protection and urgent action is required;
 - The child is in need, and should be assessed under section 17 of the Children Act 1989;
 - There is reasonable cause to suspect that the child is suffering, or likely to suffer, significant harm, and whether enquiries must be made and the child assessed under section 47 of the Children Act 1989;
 - Any services are required by the child and family and what type of services;
 - Further specialist assessments are required in order to help the local authority to decide what further action to take.
- 8.5 The telephone numbers and points of contact for all relevant external organisations may be found at Appendix 3 of this policy. The DOFA is the point of contact where allegations have been made about anyone who works with children – irrespective of whether they are paid, unpaid, volunteers, casual, agency or self-employed. Social care will be the usual point of access for anyone making a referral about a child. Both can be accessed at North Somerset Council via the Single Point of Access (the SPA). The emergency duty team (EDT) can be contacted out of office hours. Anyone, including students, may contact the Independent Schools’ Inspectorate (ISI).

9. Working with Other Agencies

- 9.1 School staff will be called upon to participate in meetings organised and chaired by Social Care. These might be in relation to:
- Early help assessments / common assessment framework (CAF);
 - Strategy discussions;
 - Child protection reviews and conferences;
 - Family group conferences for children in need or in a range of circumstances where a plan is required for the child’s future welfare;
 - Professionals’ meetings in which representative professionals from different agencies are asked to meet to discuss children and their families with a view to providing support or making recommendations in terms of next stages of involvement;
 - Core group meetings in which a ‘core’ group of professionals associated with the family are asked to meet to review the progress and actions decided at case conferences and register reviews.
- 9.2 At any such meetings, staff should be ready and prepared to report providing information about:

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- The child's attendance and punctuality;
 - The child's behaviour and attitude;
 - The child's relationships with their peer group and social skills generally;
 - The child's academic achievement;
 - The child's appearance and readiness for school;
 - Contact with parents or carers;
 - Any specific incidents that need reporting.
- 9.3 Prior to a meeting, class teachers and other adults working closely with the child should be asked for their comments. Following the meeting, feedback should be given and staff brought up to date with any actions that are needed, provided due regard to confidentiality is maintained.
- 9.4 The School may be asked to provide statements pursuant to requests from relevant agencies and provide a witness/witnesses to attend court in some cases.
- 9.5 In the event that social care wish to meet with a child to discuss any allegation, the School will provide an appropriate venue.
- 9.6 In the case of children who are seen to be at risk of radicalisation, discussion will need to take place with the referring teacher (s) / staff members and the DSL, and other staff as appropriate, as to the most appropriate body to which a referral may be made. This may include the Channel programme, Children's social care and the police. Contact details for these organisations may be found at Appendix 3.

10. When a Child Discloses an Allegation of Possible Abuse

- 10.1 Dealing with allegations of possible abuse appropriately is crucial in terms of ensuring that an accurate assessment can be subsequently carried out by the statutory agencies where appropriate and that appropriate child measures can be taken.
- 10.2 All identity cards which are issued to staff have an aide memoire printed on the back, advising how to deal with receiving information that amounts to an allegation - which could happen at any time. If a child discusses anything that could indicate the possibility of abuse, the person receiving such information should follow the procedure below.
- 10.3 Remember that a child might offer information about their own experiences or information about a friend (which could turn out to be the child him/herself).
- 10.4 Procedure for dealing with an allegation of abuse made by a child
- Listen carefully to the child, be non-judgemental, remain calm and offer reassurance and support;
 - Reassure the child that they are doing the right thing and that you recognise how hard it must be for them. The child must not feel that they are creating a problem or feel ashamed;
 - Accept what the child has to say without challenge;
 - DO NOT promise confidentiality, but let the child know that only those who need to know will be informed and that they will be people who have to know in order to help them;
 - Listen, but do not investigate or ask leading questions. Do not ask further questions as soon as the child has disclosed that he or she believes that something abusive has happened to him or someone else;
 - Observe bruises or other signs of injury, but do not ask the child to remove or adjust clothing to investigate further;
 - Do not lay blame or criticise the child or the perpetrator. Be non-judgemental;
 - Time should be taken to reassure the child and confirm at the conclusion of the conversation that information will be treated seriously and sensitively;

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- Ask the informing child what steps they would like taken to protect them now that they have made an allegation and advise that whilst the School will try to follow their wishes there can be no guarantee of confidentiality if it is necessary to inform statutory agencies for example if they or another child are (at risk of) suffering significant harm etc.

If a child requests it, contact will always be made with social care.

10.5. Procedures for monitoring, recording and reporting:

10.5.1 At the time, or as soon as possible, a detailed record should be written about the allegation using MyConcern including:

- The name(s) of the child(ren) making the allegations, and the names of any others mentioned;
- The time and date of the conversation;
- The place and context of the disclosure;
- A detailed account of the conversation, circumstances and any other relevant factors. This should be factual and not contain any assumptions or interpretation. The child's own language should be quoted, rather than translating into own terms. Be aware that this report may be used at a later date to support a referral to an external agency;
- The name of the person reporting the disclosure, the date and signature.
- If making notes during any disclosure, staff must be very conscious of the need to remain engaged with the child and not appear distracted by the note-taking;
- If at all possible, disclosures should be managed with two members of staff present.

10.5.2 Any original notes (include jottings) of the original disclosure, text messages and any potential material which could become evidence in any subsequent investigation must be retained and given to the DSL, the DDSL or Headmaster to be uploaded onto MyConcern for safe storage.

10.5.3 If injuries such as bruises have been observed these should be marked on a body map which is available from the Health Centre.

10.5.4 It is not the staff member's role to investigate the allegation – rather to listen to the child, record the information accurately and pass it on immediately.

10.5.5 Staff should not assume that someone else is dealing with the alleged incident and should report it, if in doubt.

10.5.6 This should be given to the DSL as soon as possible (or a Deputy DSL if the DSL is not available). The DSL will then follow the procedure outlined above in terms of liaising with social care.

11. The School's Procedure for Dealing with Allegations of Abuse by One or More Students against One or More Students (Peer Abuse)

11.1 All staff should be aware that children can abuse other children (peer on peer abuse). This is most likely to include, but may not be limited to the following, which in some cases will or may constitute criminal offences:

- Bullying (including cyber- bullying)

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- Physical abuse such as hitting, kicking, biting, hair pulling
 - Sexual violence
 - Sexual harassment such as sexual comments, remarks, jokes, unwanted touching, and online sexual harassment which may be stand-alone or part of a broader pattern of abuse
 - Upskirting – which typically involves taking a picture under a person’s clothing without them knowing with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm;
 - Sexting (youth produced sexual imagery)
 - Initiation / hazing type violence and rituals
- 11.2 A student against whom an allegation of abuse has been made may be suspended from the School during the investigation and the School’s policy on behaviour, discipline and sanctions will apply in the form of the anti-bullying policy. In addition, the School’s Digital Safety (12.1) and Student Acceptable Use (12.4) policies will apply.
- 11.3 The School will take advice from children’s social care on the investigation of such allegations, and will take all appropriate action to ensure the safety and welfare of all students involved, including the student or students accused of abuse.
- 11.4 If it is necessary for a student to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of children’s social care and the police, parents are informed as soon as possible and that the student is supported during the interview by an appropriate adult. In the case of students whose parents are living abroad and cannot attend the School at very short notice, the student’s educational guardian will be requested to provide support to the student and to accommodate him / her if it is necessary to suspend him or her during the investigation.
- 11.5 Where an allegation has been made against a student, all of those involved, including witnesses, will be treated as being at risk of significant harm. It is recognised that those with special educational needs are at particular risk of peer abuse and teachers are alert to this.
- 11.6 A bullying concern will be treated as a child protection concern when there is reasonable cause to believe that a child is suffering or likely to suffer significant harm which may warrant referral to an external agency. (Please refer to appendix 3). A risk-based approach will be adopted where there are concerns of an ongoing risk of significant harm; for example, a risk assessment (with the benefit of the advice of statutory authorities, where appropriate) must be carried out with a view to ensuring the safety of all students and that all children involved, including witnesses, receive appropriate support.
- 11.7 The School’s anti-bullying policy gives extensive guidance to staff and students, and details how students who have been bullied will be supported.
- 11.8 Responses to the alleged behaviour will be considered on a case-by-case basis and will take into account the circumstances of all of those children concerned. It is understood that harmful behaviour can progress on a continuum and that addressing inappropriate behaviour can be an important intervention in preventing future harm. Children who abuse may themselves have suffered abuse and an assessment of the child shall take into account wider environmental factors which threaten their safety or welfare. The DSL and his team will take such matters into account when considering the appropriate approach.
- 11.9 It is acknowledged that sexual violence and harassment may be driven by wider societal factors such as stereotypes and sexist language. The DSL and his team will consider

the context of any abuse (contextual safeguarding). Harms outside of the family may take many forms and children may be vulnerable to many different types, including sexual exploitation, criminal exploration and serious youth violence. The School works hard to challenge such behaviours through its curriculum and extra-curricular activities and to promote mutual respect. The School will not dismiss certain behaviour simply as “banter”, “just having a laugh” or “part of growing up”. Unwanted touching and associated behaviours are not tolerated.

- 11.10 The School will liaise with the respective parents appropriately considering what information should be provided about any other child, taking into account the views of other agencies. Any measures taken to protect a child will be discussed with their parents unless the law or external agencies dictate otherwise.

12. The School’s Arrangements for Handling Allegations of Abuse against Members of Staff, Volunteers and the Headmaster

- 12.1 The School has procedures for dealing with allegations against staff that aim to strike a balance between the need to protect children from abuse, and the need to protect staff from false or unfounded allegations. These procedures are based on Keeping Children Safe in Education, DfE, 2019. These procedures will be used where the member of staff has been alleged to (or may) have:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child; or
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm if he or she worked regularly or closely with children.
- Behaved or may have behaved in a way that indicates that they may not be suitable to work with children whereupon any risks to children should be considered (for example domestic violence inside the home)

- 12.2 If an allegation is made against a member of staff (as defined at paragraph 2 to include supply staff), the matter will be dealt with by the DSL or in her absence the Chair of Governors who will oversee the process as the ‘Case Manager’, and will keep the Headmaster informed.

- 12.3 Where an allegation or complaint is made against the DSL, the matter should be reported immediately to the Headmaster, or in his absence the Chair of Governors.

- 12.4 Where an allegation or complaint is made against the Headmaster, the person receiving the allegation should immediately inform the Chair of Governors or in his/her absence the Deputy Chair, without first notifying the Headmaster.

- 12.5 If an allegation is made against the Chair of Governors, the allegation shall be reported to the Headmaster. Where appropriate, the Headmaster will consult with the DSL, or his/her deputy/ies.

- 12.6 All allegations that come to the School’s attention, including those discussed directly with the police, will be discussed with the DOFA immediately where possible, and certainly within one working day. It will be more usual practice to discuss any course of action, including referral to the police, with the DOFA prior to embarking on any course of action.

- 12.7 Allegations against a member of staff who is no longer employed by the school will be referred to the police along with allegations that may amount to a criminal offence

- 12.8 No member of staff may investigate an allegation of abuse made against themselves.

- 12.9 The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern. In this

situation, the decision and a justification for it should be recorded by both the case manager and the DOFA, and agreement reached on what information should be put in writing to the individual concerned and by whom. The Case Manager should then consider with the DOFA what action should follow both in respect of the individual and those who made the initial allegation.

- 12.10 If there is cause to suspect a child is suffering or is likely to suffer significant harm, a strategy discussion should be convened by Social Care in accordance with the statutory guidance Working Together to Safeguard Children 2018. If the allegation concerns physical contact, the strategy discussion or initial evaluation with the police should take into account that teachers and other school staff are entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour (please refer to policy 5.7 physical restraint policy).
- 12.11 The Case Manager will usually inform the accused person of the allegation as soon as possible after the DOFA has been consulted, unless it would place a child at further risk of significant harm or jeopardise a police investigation. The parents or carers of the student(s) involved will be informed of the allegation as soon as possible if they do not already know of it. Where the DOFA advises that a strategy discussion is needed, or the police or the local authority's social care services need to be involved, the Case Manager shall not inform the accused or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed. Please refer to paragraph 12.16 below.
- 12.12 **Support for Staff** - The School has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. The procedures for dealing with allegations need to be applied with common sense and judgement. Individuals should be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless external agencies object to this. A representative will be appointed by the Case Manager to keep him or her informed of the progress of the case and to consider what other support is available for the individual, as appropriate. Social contact with colleagues and friends should not be prevented, unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

12.13 Action Against the Accused

12.13.1 The following definitions should be used when determining the outcome of allegation investigations:

- Substantiated: there is sufficient evidence to prove the allegation;
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- False: there is sufficient evidence to disprove the allegation;
- Unsubstantiated: there is insufficient evidence to either to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence;
- Unfounded – there is no evidence or proper basis which supports the allegation being made and there may be evidence which supports the account of the staff member (for example, an allegation that a teacher was in a certain place in a certain time, and there is evidence to show that the teacher was in fact elsewhere).

12.13.2 Where an investigation by the police or the local authority children's social care services is unnecessary, the DOFA will discuss the steps to be taken with the Case Manager. The appropriate action will depend on the nature and

circumstances of the allegation and will range from taking no further action to summary dismissal, or a decision not to use the person's services in the future.

12.13.3 It may be necessary to undertake a further investigation to determine the appropriate action. If so, the DOFA will discuss with the DSL, Headmaster or Chair of Governors as appropriate, as to how and by whom the investigation will be undertaken. The appropriate person will usually be a senior member of staff, but in some instances, it may be appropriate to appoint an independent investigator as advised by the North Somerset Safeguarding Children Partnership.

12.13.4 If an allegation is made against a member of resident staff, consideration will be given as to whether the member of staff should be asked to move off site, the cost of this may need to be funded by the staff member concerned depending on the circumstances of the case.

12.13.5 In the event of a child protection allegation against a member of staff, the timing of the process outlined above will take precedence over the disciplinary policy. However, the provisions of the disciplinary process may be invoked irrespective of whether the child protection concern is substantiated (for example the staff member's conduct may not have amounted to a child protection concern, however it may fall short of the standard required).

12.13.6 If there has been a substantiated allegation against a member of staff, the DSL will work with the case manager to determine whether there are any improvements to either policy or practice which would prevent the recurrence of a similar matter. This includes issues arising from the decision to suspend the staff member, the duration of the suspension and whether or not suspension was justified.

12.14 Suspension

12.14.1 Suspension must not be an automatic response to an allegation and all options to avoid suspension should be considered prior to taking that step. Suspension will only be considered in a case where:

- There is cause to suspect student (s) at the School is, or are at risk of significant harm;
- or
- The allegation is so serious that it might be grounds for dismissal.

12.14.2 The professional reputational damage that can arise from suspension where an allegation is later found to be unsubstantiated, unfounded, false or malicious must be considered. Alternative arrangements to suspension must be considered, for example, redeployment. If there is no reasonable alternative to suspension and suspension is deemed appropriate, the reasons and justification for this will be recorded and the individual notified of the reasons.

12.14.3 Where it has been deemed appropriate to suspend the person, written confirmation will be dispatched within one working day, giving as much detail as appropriate for the reasons for the suspension. The person will be informed at the point of their suspension who their named contact is within the organisation and

provided with his/her contact details. She / he will be regularly updated as to the progress of the investigation unless it would prejudice the investigation process, and any work-related issues. Options for additional support will be discussed.

12.15 Sharing Information with Parents

12.15.1 Parents or carers of a child or children involved shall be told about the allegation as soon as possible if they do not already know of it. However, where a strategy discussion is required, or police or children's social care services need to be involved, the Case Manager shall not do so until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers. Parents or carers should also be kept informed about the progress of the case, and told the outcome where there a criminal prosecution does not ensue, including the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed, but the parents or carers of the child should be told the outcome in confidence.

12.15.2 Parents and carers shall also be made aware of the prohibition on reporting or publishing allegations about teachers in section 141F of the Education Act 2002, as amended (see below). If parents or carers wish to apply to the court to have reporting restrictions removed, they will be told to seek legal advice.

12.16 Criminal Proceedings

12.16.1 The School will consult with the DOFA following the conclusion of a criminal investigation or prosecution as to whether any further action, including disciplinary action, is appropriate and if so, how to proceed. The options will depend on the circumstances of the case, including the result of the police investigation or trial and the standards of proof applicable.

12.17 Return to Work

12.17.1 If it is decided that the person who has been suspended can return to work, the School shall consider how to facilitate this. For example, a phased return may be appropriate and / or the provision of a mentor to provide assistance in the short term. The School shall also consider how to manage their contact with the student(s) who made the allegation.

12.18 Ceasing to Use Staff

12.18.1 If the School ceases to use the services of a member of staff (or a governor or volunteer) because they are unsuitable to work with children, there will be a prompt and detailed report to the Disclosure and Barring Service (DBS) (irrespective of whether the individual has been deployed to an area of work not within the scope of regulated activity), and to the Teacher Regulation Authority (TRA) in the case of teaching staff considered unsuitable to work with children (following unacceptable professional conduct, conduct that may bring the profession into disrepute or a relevant offence).

12.18.2 The School has a legal duty to refer promptly to the DBS any person (including a student):

- who has harmed, or poses a risk of harm to a child, or

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- if there is reason to believe a member of staff has committed one of a number of listed offences,
 - and/or if they have been removed from working (paid or unpaid) in Regulated Activity, or would have been removed had they not left.

12.18.3 A compromise agreement will not be used to prevent a referral to the DBS, nor can an individual's lack of co-operation. The School will also notify the police promptly if a crime has been committed or is suspected.

12.18.4 The School will notify the training agency in the case of trainee teachers or other personnel undertaking training at the School.

12.18.5 The Governing Body and Senior Leadership Team of Sidcot School recognise the requirement to report any serious incidents, such as suspicions, allegations or incidents of abuse of vulnerable beneficiaries, to the Charities Commission.

12.18.6 Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the Governing Body without delay.

12.18.7 Contact details for the above agencies are detailed in appendix 3.

12.19 Resignation

12.19.1 If a member of staff (or a governor or volunteer) tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by the School. Resignation will not prevent a prompt and detailed report being made to the DBS and TRA in appropriate circumstances. Compromise agreements will not be used in such circumstances, and the providing references policy (9.26) will be adhered to.

12.20 Timescales

12.20.1 All allegations must be dealt with as a priority to avoid any delay. Where it is immediately clear that the allegation is unfounded, false, or malicious, the case should be resolved within one week. It is expected that most cases of allegations of abuse against staff will be resolved within one month with exceptional cases being completed within 12 months. If the nature of the allegation does not require formal disciplinary action, the Headmaster should institute appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, it should be held within 15 working days in term time.

12.21 Confidentiality

12.21.1 The School will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. Reporting restrictions under the 2011 amendment to the 2002 Education Act will be paramount and remain in place until such time as:

- The accused person is charged with a criminal offence, or;
- The TRA under the direction of the Secretary of State, publishes information about the case, or;
- A judge lifts the reporting restrictions, or;
- The individual to whom the restrictions apply effectively waives his/her right to anonymity by going public themselves or by giving their written consent for another to do so.

12.21.2 The Case Manager will take advice from the DOFA, police and children's social care services to agree the following:

- Who needs to know and, importantly, exactly what information can be shared;
- How to manage speculation, leaks and gossip;
- What, if any information can be reasonably given to the wider community to reduce speculation; and
- How to manage press interest if and when it should arise.

12.22 Existing Staff

12.22.1 If the School has concerns about an existing staff member's suitability to work with children, all relevant checks may be made as if the person were a new member of staff. Similarly, if a person working at the School moves from a post that was not Regulated Activity, into work which is Regulated Activity, the relevant checks for the Regulated Activity must be carried out. This also applies if a staff member moves into an area of work where the Disqualification Regulations under section 75 of the Childcare Act 2006 apply.

12.22.2 All staff are required to notify the School immediately if there are any reasons why they should not be working with children - this will include notification of convictions, cautions, court orders, reprimands or warnings. This includes any staff member who has been disqualified from working with children under the Childcare Act 2006. Those who are disqualified may apply to Ofsted for a waiver, but cannot work in the relevant settings until this has been determined.

12.22.3 The School will ask relevant staff members annually if there has been a change to the circumstances which would mean that they may be disqualified from working with children under this provision.

12.23 Providing references

12.23.1 Only line managers may provide a reference for a member of staff, and they must adhere to the providing references policy. Failure to do so is likely to constitute a disciplinary matter.

12.24 Malicious Allegations

12.24.1 Where an allegation by a student is shown to have been deliberately invented, malicious, or unfounded the Headmaster will consider whether to take disciplinary action in accordance with the School's behaviour and discipline policy.

12.24.2 Where a parent has made a deliberately invented or malicious allegation the Headmaster will consider whether to require that parent to withdraw their child or children from the School on the basis that they have treated the School or a member of staff unreasonably.

12.24.3 Whether or not the person making the allegation is a student or a parent (or other member of the public), the School reserves the right to contact the police to determine whether any action might be appropriate.

12.24.4 Allegations that are not substantiated, are false, unfounded or malicious will not be referred to in employer references.

12.25 Support for a Student Making an Allegation

- 12.25.1 In cases where a child may have suffered significant harm, or there may be a criminal prosecution, children's social care services, or the police as appropriate, should consider what support the child or children involved may need.
- 12.25.2 Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, schools and colleges should be aware of anonymity, witness support and the criminal process so they can offer support and act appropriately. A list of guidance can be found in appendix 5. The School is particularly aware of the potential impact of social media in facilitating the spread of rumours and exposing the identity of someone who is understood to have suffered abuse.
- 12.25.3 An immediate risk assessment will be undertaken in accordance with the risk assessment policy to consider all of those involved. The risk assessment will not wait for the outcome of a police investigation but may be informed by it subsequently.

12.26 Record Keeping

- 12.26.1 Details of allegations that are found to have been false or malicious should be removed from personnel records, but will be retained as part of a separate safeguarding record. They will not be referred to in any reference. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned. The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time. The record will be retained for a period in accordance with guidelines published by the Independent Inquiry into Sexual Abuse and data protection laws.

13. Missing, Lost and Uncollected Children

- 13.1 If a child goes missing from School or a boarding house, staff shall follow the School's procedures (Policies 1.2 and 1.2a) and be vigilant for signs that this might indicate abuse or neglect, and consider whether this may suggest inclusion of the child on the School's vulnerable students register or referral to any statutory agency.
- 13.2 Longer term and repeated absences from school are monitored by a student's tutor and Head of Year and staff are aware of the need for vigilance with regards to possible cases of FGM, CSE, forced marriage or where a student may be vulnerable to radicalisation. In each case the DSL will be informed when a student is absent for more than 10 consecutive days and contact will be made with Children's Social Care. The School will inform the Local Authority where a student's name is to be deleted from the admission register on certain grounds – for example where the family proposes to home school the child, has apparently moved away, has been certified as unfit to attend School, or where the child has been permanently excluded. In addition, the School will notify the Local Authority when they remove or add a student's name to the admissions register at non-standard transitions (for example where a student of compulsory school age leaves prior to completion of the School's final year or joins the School after the beginning of the first

year). This duty applies within 5 days of a students' name being added to the register, or as soon as the grounds are met when a student's name is to be deleted from the register. The School will work co-operatively with the local authority to undertake reasonable inquiries.

- 13.3 Staff will notify the Children's Social Care Team immediately if there is an unexplained absence of any student who is subject to child protection procedures, or an absence which has been explained, but where the School is concerned.
- 13.4 When a child is not collected within expected timescales, the School's Uncollected Child Policy will be followed (policy 1.4).

14. The School's Staff Code of Conduct (Staff Behaviour Policy 2.2)

- 14.1 The School's Staff/Student Code (Policy 2.2) is a very significant policy as it sets out clear guidelines for staff which safeguard both students' welfare, and staff from putting themselves in vulnerable situations when allegations can be made, for example, in one-to-one tuition, sports coaching, conveying a student by car, engaging in inappropriate electronic communication with a student, and so on.
- 14.2 All staff are required to read the code of conduct annually, be familiar with it and adopt it. It is available in the Staff handbook on Firefly (the school's intranet and VLE) and all staff are required to confirm that they have read and understood the policy on an annual basis. It is also available in hard copy form free of charge.

15. Whistleblowing Procedures

- 15.1 Please refer to separate whistleblowing policy 9.9 which all staff must be familiar with.
- 15.2 All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the School's safeguarding regime. All concerns are taken seriously by the Senior Leadership Team.
- 15.3 In the event that a staff member is concerned about poor or unsafe practices in the safeguarding regime, and they do not feel that raising the matter with the DSL or a member of her team would be either effective or appropriate, they may approach the Headmaster or the Chair of Governors about the issue. Staff should be aware that they may make a referral direct to social care about the safety of any child / children. The protections of the whistleblowing policy apply.
- 15.4 Staff may also contact the NSPCC whistleblowing helpline – contact details may be found in Appendix 3.

16. The School's Recruitment Procedures

- 16.1 The School has a culture of safe recruitment and, as part of that, has adopted recruitment procedures that help to deter, reject or identify people who might abuse children. Statutory guidance including Part 3 of Keeping Children Safe in Education, DfE, 2019 is followed.
- 16.2 Please refer to the separate policies in respect of recruitment of staff, governors, and volunteers.

17. Supervision of Visitors and Contractors

- 17.1 Visitors (including visiting speakers) will be admitted only by signing in and out of the School and will remain supervised by a member of staff at all times. This is detailed in the School's Visitors Policy (3.5). A risk assessment is required to be carried out in respect of visiting speakers which takes account of the Prevent duty.
- 17.2 Contractors coming on site will have their identity checked, be risk assessed, have the appropriate checks undertaken and be appropriately supervised. Please refer to the supervision of unchecked staff, contractors, agency staff and volunteers policy 9.27 and appropriate risk assessment. No person may be involved with overnight supervision of children or work in personal care until all relevant checks have been undertaken.

18. The Training of the DSL Staff, Volunteers and the Headmaster

- 18.1 The School will continue to:
- Provide the DSL with the time, funding, training, resources and support to enable her to support other staff on safeguarding matters. The DSL and her deputies regularly attend courses with child support agencies to ensure that they remain conversant with best practice. Deputies are trained to the same standard, and undergo refresher training at least every two years, have job descriptions for their safeguarding roles and key activities. Their training meets the requirement of Annex B to the DfE's "Keeping Children Safe in Education" and covers inter-agency working, participation at child protection case conferences, supporting children in need, identifying children at risk of radicalisation, record keeping and promoting a culture of listening to children. The DSL and at least one deputy will also attend WRAP (Workshop Raising Awareness of Prevent) training as advised by the Prevent Guidance. The DSL and at least one deputy have attended Prevent Training and are aware of the Channel programme. They will ensure that all staff are appropriately informed of this, and also their duties to report any cases of FGM.
 - Ensure that the DSL, her deputies and assistants and the Headmaster undertake two-day multi-agency training recommended by the Safeguarding Board;
 - Ensure that there is always a nominated Governor with responsibility for safeguarding who meets at least once a term with the DSL and who has undergone appropriate training every two years;
 - All existing staff will receive training regarding any updates to child protection legislation and practice as required and at least annually. Informal updates (for example staff briefings and emails) will be provided as required.
 - Every new member of staff, including part-timers working in the School, receives appropriate training on their responsibilities in being alert to the signs of abuse, bullying, sexting and on the procedures for recording and referring any concerns. Staff are also given training to identify any children at risk of being drawn into terrorism, and to challenge ideas which can be used to legitimise terrorism and are shared by terrorist groups. Training in child protection is an important part of the induction process. Training includes a review of the School's child protection policy including the whistleblowing policy, staff student code (the staff behaviour policy), awareness training to equip staff to identify children at risk of being drawn into terrorism, the behaviour policy, procedure for missing children, the identity of the DSL and a copy of Parts 1 and 5 of KCSIE which should be read and understood each year or when there is an update. All staff working directly with children must also read and understand Annex A of KCSIE along with all other

relevant policies. Training also promotes staff awareness of child sexual exploitation, sexual violence and sexual harassment between children, forced marriage and female genital mutilation. Staff are made aware of the signs, symptoms and indicators of such practices and are required to take action without delay if such a practice is suspected. All visitors are given a leaflet outlining key areas of Safeguarding and Child Protection.

19. The School's Arrangements to Fulfil Other Safeguarding and Welfare Responsibilities

19.1 Raising Awareness - the School will continue to raise awareness of child protection issues by:

- Ensuring that every member of staff (including temporary and supply staff, Governors and volunteers) knows the name of the DSL responsible for child protection and their role;
- Ensuring that staff are aware of all new statutory duties and how to act (for example a duty to report cases of FGM, or to prevent students from being drawn into terrorism, for example by referral to the Channel programme);
- Ensuring that parents have an understanding of the responsibility placed on the School and staff for safeguarding and child protection by setting out its obligations on the school website;
- Contributing to the wider safeguarding agenda by working with the local community and following government guidance to help students live and work in a safe environment;
- Ensuring that other policies which contribute towards safeguarding children and young people are reviewed and updated regularly and appropriate advice sought. Related policies appear at appendix 4.
- The School will keep staff aware of emerging safeguarding and child protection themes as they arise – sexting for example. Please refer to appendix 1 for information regarding offences created by sexting.
- Staff are given the opportunity to contribute to and shape the child protection policies.
- Ensuring that lessons are learned if appropriate from any incidents where allegations are substantiated or improvements to procedures deemed justified.
- Ensuring that the DSL reports regularly to the Board of Governors on child protection matters and the effective implementation of policy and procedure.

20. Equipping all Children with the Skills Needed

20.1 The School recognises that because of the day to day contact with children, staff in schools are well placed to observe the outward signs of abuse and that all staff, volunteers and Governors have a full and active part to play in protecting our students from harm.

20.2 The School will therefore:

- Ensure that children know that there are adults in the School who they can approach if they are worried and in whom they can confide; (This information is published on posters around the school and in The Blue Book);
- Clearly show the names of the DSL, her deputies and assistants in the school, with a statement explaining the school's role in referring and monitoring cases of suspected abuse;

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- Include opportunities in the PSHE programme for children to develop the skills they need to recognise and stay safe from abuse in conjunction with being aware of the signs and types of abuse, and what consent amounts to in practice;
 - Have regard to the need to ensure the safety of children whilst on-line and to prevent children from being drawn into terrorism, including through exposure to the dangers of radicalisation and extremism through the expression of fundamental British Values, the PSHE programme and other opportunities which form a core part of Sidcot's values;
 - Take care in regard to the discussion of sensitive issues – seeking advice where there are concerns. Within the curriculum there will also be opportunities to discuss issues which some children might find sensitive and/or disturbing. Care should be taken particularly in relation to discussion about members of families and family make up. Assumptions about members of families and the presence of both parents should be avoided both in discussions and the presentation of materials. During health and safety discussions and relationships and sex education, staff should be alert to the fact that some children will have very different experiences and may find the content 'sensitive' within their own histories. No particular lifestyle should be promoted. Staff should make themselves familiar with the background of the children in their care in order to avoid children becoming distressed. Heads of Year and the Health Centre will be able to provide additional advice.

20.3 Support in School - Boarding

- 20.3.1 All matters in this policy apply equally to boarding students at all times that they are students (including time spent in their boarding houses).
- 20.3.2 This policy is consistent with the requirements of the National Minimum Standards (N.M.S. Standard 11) for boarding schools. The requirements of N.M.S. 11 are embedded within the policy.
- 20.3.3 Specific guidance about whom boarders can contact if something is making them unhappy is published on posters in the boarding houses and in The Blue Book and Boarders' Handbook.
- 20.3.4 Staff involved in boarding houses and those who have greater access to children in the School are subject to the additional checks demanded under 19 (2) (e) ISI Regulatory Requirements (2015) and N.M.S. 14 (2015). The School has a risk assessment policy and Health and Safety Policy which fulfils the requirements of NMS 6.3. The Adults staying with Resident Staff Policy (9.3) also applies.
- 20.3.5 The School will ensure that the students are aware of the independent listeners and how to contact them with posters placed at prominent places including by phones in boarding houses. They are also available at Meeting for Worship on Sundays.
- 20.3.6 Office holders, including Heads and Deputy Heads of Boarding Houses are briefed on the contents of this policy with emphasis on their responsibility towards safeguarding peers and younger children, recognising forms of abuse, dealing with disclosures and reporting;
- 20.3.7 A written agreement will be made between the School and any person over 16 (not employed by the school but living in the same premises as boarders e.g. members of the staff households) which together with policy 9.30 (adults staying with resident staff policy) covers matters such as:
 - The terms of their accommodation;
 - Guidance on contact with boarders;

-
- Their responsibility to supervise their visitors;
 - Advice that their accommodation may be withdrawn if evidence comes to light about any unsuitability to have contact with children;
 - The requirement to notify an unrelated designated senior member of staff if they are charged with, or convicted of, any criminal offence.

20.4 Early Years (EYFS)

20.4.1 The School's policy regarding digital images and mobile phones is of particular relevance to the Early Years' setting –digital safety policy and staff code of conduct apply..

20.4.2 Early years providers have a duty under section 40 of the Childcare Act 2006 to comply with the welfare requirements of the Early Years Foundation Stage. As an Early Year's provider, the School will ensure that:

- Staff complete safeguarding training that enables them to recognise signs of potential abuse and neglect; and
- They have an appropriately trained practitioner (named at paragraph 1.5) who is designated to take lead responsibility for safeguarding children within each Early Years setting and who will liaise with local statutory children's services agencies as appropriate.

20.5 Supporting Students

20.5.1 The School will:

- Recognise that a child who is abused or harmed, sexually or otherwise who witnesses violence or who lives in an abusive or violent environment may feel helpless and humiliated, may blame him/herself, and find it difficult to develop and maintain a sense of self-worth. Such children may struggle to maintain a full-time table and may express a wish to withdraw from some lessons and activities. Where this assists them to manage a situation, the school will facilitate this as far as is reasonable
- Further recognise that the School may provide the only stability in the lives of children who have been abused or who are at risk of harm;
- Accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn;
- Ensure that children who have been abused are particularly closely monitored and supported and any concerns are recorded and reported to Social Care. Support may be necessary to protect and support students for a long time. Regardless of whether the police take action, the School will continue to support any child who feels that they have suffered abuse.
- Do all that is reasonable to protect children from bullying and harassment as a result of making a report.
- Implement a Personal Education Plan for all Children in Care and a Pastoral Support Plan or Individual Education Plan for other children where there is a need for specific support;
- Provide continuing support to a child (about whom there have been concerns) who leaves the School by ensuring that such concerns and school medical records are forwarded under secure confidential cover to the DSL at the

student's new school as a matter of urgency, and in any event within 10 working days;

- Establish a safe environment in which all children feel safe, secure, valued and respected, feel confident and know how to approach adults if they are in difficulties or feel threatened;
- Support each child's development in ways that will foster security, confidence and resilience and help develop effective working relationships with all other agencies involved in safeguarding children such as Social Care, Child and Adolescent Mental Health Services, Education Welfare, Educational Psychology, voluntary agencies;
- Liaise with social care to provide information where required, attend such meetings as requested and support any child protection plan;
- Consider supporting the students concerned through the vulnerable students' register.

In addition to the appropriate sanction, if any, consider, in all the circumstances, what support should be offered to any student who is alleged to have been responsible for harmful behaviour.

21. Monitoring and Evaluation of this Policy

21.1 The School and its governors monitor and evaluate the effectiveness of this safeguarding and child protection policy and procedures through the following activities:

- Governor visits to the School
- Frequent scrutinising of attendance data
- Regular analysis of a range of risk assessments
- Scrutiny of termly report in Board meetings
- Logs of bullying / racist behaviour incidents are reviewed regularly by the senior leadership team and the governing body
- Regular review of parental concerns
- Scrutiny of the Single Central Register of Appointments.

21.2 Board Meetings

21.2.1 As part of the School's commitment to establishing a safe environment for children, the Governing body will receive a termly update from the Designated Governor responsible for Safeguarding confirming that they have made a detailed check on the SCR and staff files to ensure that the School is adhering to the Recruitment, Selection and Disclosure Policy and Procedure (9.13) and that checks on risk assessments for contractors have been made.

21.2.2 The Designated Safeguarding Lead will also give a termly report on the following:

- Details of any safeguarding or child protection matters that have arisen (with names of children concerned remaining confidential). A review of how the duties of all persons were discharged in relation to safeguarding matters and a review of any incidents from which lessons may be learned to include any referrals made for help and support for individual children (names to be anonymised) and details of how the School may be supporting that child in partnership with other agencies;

-
- Any significant changes to this or related policies (especially the Staff/Student Code (2.2)) that have been made. – a detailed review of the child protection report will be made at the annual meeting – see below
 - Review of logs relating to bullying / homophobic/ racist incidents, and any other complaints relevant to child protection;
 - Any significant staff or governor changes with relevance to child protection including new appointments and resignations. In the event that there has been a referral to the DOFA in respect of a staff member, anonymised detail of the follow up will be inserted and a review of how such a situation could be prevented in the future;
 - Training updates for staff (new and existing) and governors – details of courses attended, areas where more training is required and plans for future training;
 - Detail of any visits made by governing body members to the School with relevance to child protection concerns (if appropriate);
 - A review of attendance data with particular reference to any particular concern with regard to any children (anonymised names) who are regularly going missing, and how this is being addressed;
 - Details of planned review of any incidents from which lessons may be learned;
 - Any other information pertinent to child protection issues at the School (for example the impact of any new guidance, legislation, regulations, any changes in procedure e.g. to the operation of the Local Safeguarding Board, any evidence of concerns around radicalisation, FGM, child sexual exploitation, sexual harassment and violence between children etc);
 - The impact of any planned changes on the School from the perspective of child protection;
 - Any new strategies or planned changes in the forthcoming term –relevant to child protection – for example how is the School contributing to local discussions on safeguarding matters.

21.3 The arrangements for reviewing the School's child protection policies and procedures annually:

21.3.1 In addition to the matters outlined at para 20.2 above, the Board of Governors will annually:

- Receive a report from the designated governor for safeguarding which summarises the checks for the year by way of an overview;
- Receive a report on training in safeguarding and child protection for staff to ensure that all staff and designated persons have received the appropriate training within the timescales set;
- Receive a report on any safer recruitment training undertaken
- Review the policies which fall within those designated to form part of the Annual Safeguarding Review. This will comprise the Child Protection Policy and those policies which form part of it (including but not limited to the staff student code, the whistleblowing policy, recruitment policies for staff, governors and volunteers, and the anti-bullying policy).

21.3.2 If revised legislation, regulation or statutory guidance require a need for amendment to this policy, this will be effected as soon as possible and ratified by the Chair of Governors and Governor responsible for Safeguarding. Any proposed substantive changes (as determined by them) will be ratified by the

Board at the next available meeting. Any incident that dictates a change to this policy will likewise trigger an immediate review.

Signed:

A handwritten signature in black ink, appearing to be 'J. H.' with a flourish at the end.

Headmaster:

Date 006.10.2020


Chair of Governors:

Date 06.10.2020

Addendum

**COVID-19 school closure arrangements for
Child Protection and Safeguarding
at Sidcot School**

Policy Date: 10 October 2020

Version: 2

This addendum of Sidcot School's Child Protection and Safeguarding policy contains details of our individual safeguarding arrangements in the following areas:

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Key contacts

Name	Role	E-mail address	Contact number
Joanna Leite	DSL	joanna.leite@sidcot.org.uk	07471 900 671
Veronika Chidemo	DDSL	veronika.chidemo@sidcot.org.uk	07471 900 649
Cath Dykes	DDSL Junior School	cath.dykes@sidcot.org.uk	01934 845200
Julie Cook		Julie.cook@sidcot.org.uk	07980 222004
Rosemary Carr	Chair of Governors	Rosemary.carr@sidcot.org.uk	07836 786622
Iain Kilpatrick	Headmaster	Iain.Kilpatrick@sidcot.org.uk	07545 702496

All senior school staff are contactable via Teams.

Context

This addendum provides updated guidance to the school's guidance published in March 2020. It is intended to apply to periods when learning is required to take place remotely due to the Covid-19 pandemic.

Importantly from the School's perspective, notwithstanding that the School is closed to all but a few students who are either vulnerable or whose parents are keyworkers, the best interests of the children will continue to come first. Anyone with a safeguarding concern should continue to act, and act immediately in line with the School's child protection policies.

2. Vulnerable children

Vulnerable children include those who have a social worker and those children and young people up to the age of 25 with EHCPs.

Those who have a social worker include children who have a **Child Protection Plan** and those who **are 'Looked After' by the Local Authority**. A child may also be deemed to be vulnerable if they have been assessed as being a **Child in Need** or otherwise meet the definition in section 17 of the Children Act 1989.

Those with an EHCP will be risk-assessed in consultation with the Local Authority and parents, to decide whether they need to continue to be offered a school or college place in order to meet their needs, or whether they can safely have their needs met at home. This could include, if necessary, carers, therapists or clinicians visiting the home to provide any essential services. Many children and young people with EHCPs can safely remain at home.

Senior leaders, especially the Designated Safeguarding Lead (and deputies) know who the School's most vulnerable children are. They are able and have the authority if they deem it appropriate to offer a place to those on the edge of receiving children's social care support to access education at school

Sidcot School will continue to work with and support children's social workers to help protect vulnerable children. This includes working with and supporting children's

social workers and the local authority virtual school head (VSH) for looked-after and previously looked-after children. The lead person for this will be: Joanna Leite.

There is an expectation that vulnerable children who have a social worker will attend an education setting, so long as they do not have underlying health conditions that put them at risk. In circumstances where a parent does not want to bring their child to an education setting, and their child is considered vulnerable, the social worker and the School's safeguarding leads will explore the reasons for this directly with the parent.

Where parents are concerned about the risk of the child contracting COVID19, the School's safeguarding leads or the child's social worker will talk through these anxieties with the parent/carer following the advice set out by Public Health England.

Sidcot School will encourage our vulnerable children and young people to attend School, including remotely if needed.

3.Attendance monitoring

Guidance regarding the need to complete usual day-to-day attendance processes and follow up on non-attendance will be followed as it applies. The School will however take daily registers during tutor time to monitor the attendance of the students which is particularly important for safeguarding purposes. At times when the school or bubble may be closed, or if a student is isolating but not ill, they are expected to attend school via OSL. Non-attendance at OSL under these circumstances will be followed up by tutors and teachers.

Sidcot School and social workers will agree with parents/carers whether any child who is supported by social care as a 'child in need' should be attending school on site. Any non-attendance by a student who is expected to attend but does not will be followed up. The School will also follow up with any parent or carer who has arranged care at the school for their child and the child subsequently does not attend. This will be completed in line with our Child Missing Education procedures and will be followed up immediately by the DSL or DDSL and the social worker will be notified.

To support the above, we will, when communicating with parents/carers, confirm emergency contact numbers are correct and ask for any additional emergency contact numbers where they are available.

4. DSL

Sidcot School shall ensure that all staff, volunteers and students have access to a trained DSL (or deputy) at all times during any period of formal closure or when students are working remotely. Staff and students are aware of how to contact them if they have a concern (see key contacts on page 2 of the addendum).

At Sidcot School the DSL is a resident member of staff and is therefore available on site. Both the DSL and the Senior and Junior School DDSLs will be available to be contacted via phone, email or Microsoft Teams for the duration of the school closure.

In the event that there is no DSL or DDSL available (due to sickness), our school has made arrangements with the DSL trained Senior Leadership Team members to provide additional advice and support. All staff and students will be informed of this change via the school emails, tutors and Head of Year.

The DSL will continue to engage with social workers, and attend all multi-agency meetings, which can be done remotely.

5. Reporting a concern

Where staff have a concern about a child, they should continue to follow the process outlined in the school's Safeguarding Policy.

All students and parents/guardians should similarly follow the processes set out in this policy wherever they have a safeguarding concern. This is particularly important when much of School life and teaching is being conducted online, where there are specific risks in connection with cyber bullying, peer abuse, online harassment and inappropriate behaviour. A concern can be reported via the OSL safeguarding page on Firefly or via email to the DSL/DDSL.

Everyone is reminded of the need to report any concern immediately and without delay.

6. Safeguarding Training and induction

. . DSL and staff training will continue as is possible.

For the period COVID-19 pandemic measures are in place, a DSL (or deputy) who has been trained will continue to be classed as a trained DSL (or deputy) even if they miss their refresher training.

Where new staff or volunteers are recruited they will continue to be provided with a safeguarding induction.

If staff are deployed from another education or children's workforce setting to the School, we will take into account the DfE supplementary guidance on safeguarding children during the COVID-19 pandemic and will accept portability as long as the current employer confirms in writing that:-

- the individual has been subject to an enhanced DBS and children's barred list check
- there are no known concerns about the individual's suitability to work with children
- there is no ongoing disciplinary investigation relating to that individual

Upon joining the school, they will be given an electronic copy of Sidcot School's child protection policy, confirmation of local processes and confirmation of DSL arrangements.

7. Safer recruitment/volunteers and movement of staff

It remains essential that people who are unsuitable are not allowed to enter the children's workforce or gain access to children. When recruiting new staff, we will continue to follow the relevant safer recruitment processes for the setting, including, as appropriate, relevant sections in part 3 of Keeping Children Safe in Education (2020) (KCSIE) and government guidance.

In response to COVID-19, the Disclosure and Barring Service (DBS) has made changes to its guidance on standard and enhanced DBS ID checking to minimise the need for face-to-face contact.

Where we are utilising volunteers, we will continue to follow the checking and risk assessment process. Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity.

We will continue to follow the legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult.

We will continue to consider and make referrals to the Teaching Regulation Agency (TRA) as per KCSIE and the TRA's 'Teacher misconduct advice for making a referral'.

Whilst acknowledging the challenge of the current National emergency, it is essential from a safeguarding perspective that any school is aware, on any given day, which staff/volunteers will be in the school, and that appropriate checks have been carried out, especially for anyone engaging in regulated activity. As such, we will continue to keep the single central record (SCR)

8. Online safety in school

Sidcot School will continue to provide a safe environment, including online learning which includes the use of an online filtering system. In this respect, the School has developed additional policies for online supported learning applicable to all staff and students, which is contained in School Acceptable Use Policies 12.3 and 12.4, the contents of which have been promulgated to all personnel.

Where students are using computers or their own devices in school, appropriate supervision will always be in place.

Staff will only contact students via school email addresses for both staff and student.

9. Children and online safety away from school

The School's safeguarding responsibilities remain the same irrespective of whether learning is taking place on or off site . It is essential that all staff who interact with

children, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per the Child Protection and Safeguarding Policy and where appropriate referrals should still be made to children's social care and, as required, the police.

Sidcot School will ensure that any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.

Where the School intends to deliver any virtual lessons, for example via Microsoft Teams audio or video function the school will be mindful of the following, as outlined in the Acceptable User Policy for both staff and students:

- Staff will teach their classes (audio/video) online via Microsoft Teams.
- All lessons will be timetabled (where and when possible in their designated timetabled slots) and approved by the Head of Department/Faculty and the Senior Management Team. Online lessons (audio/video) will be logged on a centralised timetable that can be accessed by staff, students and parents via Firefly.
- All students must be invited to their online audio/video lessons through Teams so that it appears on their Teams calendar.
- If a student requests an online audio/video 1:1 meeting, the teacher will invite the student to the meeting through Teams so that there is a log of the meeting taking place. Such meetings must be recorded.
- All video/audio lessons (group or 1:1) and tutor sessions on Microsoft Teams will be recorded by the teacher/tutor (refer to James Russell's 'How to' guide). The teacher must remember to tell the students the lesson will be recorded. The video may be shared with other students in the class who have not been able to attend the timetabled lesson, but will not be used for any other purpose without prior consent. The recording will not be used to monitor teaching.
- The Heads of Faculties and the Senior Management Team will be able to virtually join such lessons, and otherwise consider whether in any particular circumstances (specifically, for safeguarding reasons) it would be appropriate or sensible to include a colleague in the lesson.
- For 1:1 lessons, the lessons must
 - Be notified in advance to line managers and recorded on the centralised timetable in bold and italics.
 - Be recorded (this is for staff and students' safety; the recording will not be used to monitor teaching) – The student will be told that the lesson will be recorded.

-
- Parents must be informed by the school of when audio/video 1:1 OSL lessons are taking place the school timetable is accessible to parents.
 - All lessons must be monitored by the staff member with online safety and safeguarding considerations firmly in mind, given the additional risks associated with online teaching. Staff shall consider bringing a lesson to an early close if there are any material safeguarding concerns which arise during the lesson. Please refer to Policy 2.1 in connection with reporting safeguarding concerns.
 - All sites visited to aid the learning of the students must be taken from approved Schemes of Work.
 - Staff should use communications with parents/guardians and students to reinforce the importance of staying safe online and ensure that they are clear on how to report concerns to the School.
 - Staff and students must be in a suitable workspace i.e. sitting at a desk/table with their background blurred/set on an image through the background feature on Teams.
 - Online learning shall take place be in a room where parents can easily see what the student is working on. Students should not be sitting on beds.
 - Staff and students must wear suitable clothing, as should anyone else in the household. Suitable clothing items should match the smart/casual clothing outlined in the Blue Book.
 - Behaviour/Language must be “classroom standard”, that is to say professional and appropriate, including any family members in the background.
 - Staff must remind students at the start of all online lessons, of the above – **if a student(s) does not comply, the teacher will remove them from the lesson if in a group lesson, or terminate the lesson if in a 1:1 lesson**
 - For Junior School students video links and feedback on work should be via a parents’ email address, group emails should use BCC to protect email identity.
 - Staff will inform any parent who does not wish for their child to take part in audio/video lessons, that they must inform the Heads of Faculties/Departments.
 - Staff must keep in mind privacy and data protection/GDPR requirements and report any concerns to the School’s Data Protection Officer, James Russell.
 - If staff have a concern, they will use the normal safeguarding process or call the DSL / DDSL directly

DSL, Joanna Leite: 07471 900 671

DDSL, Veronika Chidemo 07471 900649

10. Supporting children not in school

We are committed to ensuring the safety and wellbeing of all our Children and Young People.

All students have the option to report any safeguarding concern, using the school's Online Supported Learning platform (via Teams). This consists of a specifically designed concern form that, once submitted, will be forwarded to the DSL and DDSL. Training on how to access this form is provided by tutors.

Where the DSL and safeguarding team has identified a child to be on the edge of social care support, or who would normally receive pastoral-type support in school, they will continue to receive such support through the tutors, Heads of Year, school counsellor, Assistant Head (Pastoral Care and Wellbeing) and the Deputy Head (Pastoral), and appropriate communication with the student's family will continue.

Any pastoral and wellbeing concerns will continue to be recorded on MyConcern.

Any students causing concern will be discussed weekly by the Pastoral Team and where significant safeguarding concerns arise, the DSL will consider any referrals as appropriate.

Sidcot School also recognises that family circumstances can change quickly during this challenging time and therefore new families may become vulnerable or in need of support. The school continues to invite parents to share concerns so that we can provide appropriate support which can include remote contact, phone contact, door-step visits - which will be recorded.

We will also ensure that families are aware of how they may contact our pastoral care/ safeguarding team for support. This will be via the information page on the Online Supported Learning Firefly page.

The School will share safeguarding and pastoral support messages on its website and social media pages. We recognise that school is a protective factor for children and young people, and the current circumstances can affect the mental health of students and their parents/carers. We will take this into consideration when providing work. Students will continue to have access to individual support via their tutors as well as the option to self-refer to the school counsellor for confidential Mental Health advice. Parents are also invited to get in touch with the Pastoral Team with any questions or concerns they might have about their child(ren). Students are expected to be in daily contact with their tutors at a specified time.

As a school we will ensure that where we care for children of critical workers and vulnerable children on site, appropriate support is in place for them. This will be bespoke to each child and where appropriate recorded as per the usual processes.

11. Peer on Peer Abuse

Our School recognises that during a closure a revised process may be required for managing any report of such abuse and supporting victims. Students have been advised to report any safeguarding concern, using the school's Online Supported Learning platform.

Where the School receives a report of peer on peer abuse, it will follow the principles as set out in part 5 of KCSIE and those outlined within the School's Child Protection Policy.

The School will listen and work with the young person, parents/carers and any multi-agency partner required to ensure the safety and security of that young person.

Concerns and actions must be recorded and appropriate referrals made as per the usual processes.

12. Children moving school

For any student who leaves Sidcot School to be educated in another setting, it is the responsibility of Sidcot School to provide the receiving school with any relevant welfare and child protection information, having appropriate regard to data protection legislation. This will be especially important where children are vulnerable and during any time of online supported learning, when children will be less “visible.” The usual processes will apply.

Appendix 1 - Types, Definitions and Signs of Abuse and Neglect

Abuse neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another. The following provides a list of some of the common signs of abuse. They may not all be present and the list is not exhaustive. Abuse may not be confined to one particular type. Knowing what to look for is vital to the early identification of abuse and neglect. If staff are unsure they should always speak to the DSL or a member of her team.

Abuse: A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them, or more rarely by others (eg via the internet). They may be abused by an adult or adults or another child or children.

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

Potential Signs of physical abuse:

- Unexplained injuries or burns
- Improbable explanations of injuries
- Admission of punishment which appears excessive
- Fear of returning home or parents being contacted
- Fear of medical help
- Over compliant behaviour
- Significant changes in behaviour
- Unexplained pattern of absences
- Refusal to discuss injuries
- Untreated injuries or lingering illness
- Shrinking from physical contact
- Fear of undressing
- Aggression / bullying
- Running away
- Deterioration in work

Physical abuse also occurs if the parent or carer fabricates or induces an illness in the child.

Emotional abuse: Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as

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

Potential Signs of Emotional abuse

- Continual self-deprecation
- Inappropriate emotional responses to painful situations
- Compulsive stealing / scrounging
- Air of detachment 'don't care' attitude
- Eating problems
- Depression, withdrawal or 'neurotic' behaviour such as obsessive rocking, thumb-sucking
- Fear of new situations
- Self-harm or mutilation
- Drug / solvent abuse
- Social isolation
- Attention seeking behaviour

Sexual abuse:

- **A child under the age of 13 can never consent to any sexual activity**
- **The age of consent is 16**
- **Sexual intercourse without consent constitutes rape as does intentionally penetrating the anus or mouth of another person with his penis if the other person does not consent; Assault by penetration occurs if an object is used.**
- **Creating and sharing sexual photos and videos of children under 18 is illegal.**
- Under the terms of the Sexual Offences Act (2003), all staff are strictly forbidden from entering into an intimate relationship, with any student at this school, even those over the age of 18.

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 rape, sexual assault and assault by penetration, 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, upskirting, watching

sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

Sexual harassment is “unwanted contact of a sexual nature which may occur both online and offline.” It may include sexual comments and jokes, taunting, physical behaviour such as deliberately brushing against someone, displaying photos or drawings, and online sexual harassment which may include the sharing of sexual material on social media, and threats. Sexual harassment may create an atmosphere that can normalise behaviours, and provide an environment that could lead to sexual violence.

“Consent” involves an individual having the freedom and capacity to choose. This encompasses the freedom to consent to a particular type of sexual contact but not to others.

Sexual abuse and harassment is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Child sexual exploitation (CSE) takes place when an individual (male, female, child or adult) or group takes advantage of an imbalance of power (for example age, gender, strength, access to economic or other resources) to coerce, manipulate or deceive a child into sexual or criminal activity, online or in person. Victims can be exploited even when the activity appears to be consensual.

“Sexting” relates to the sending or receiving of sexually explicit text, taking of indecent images, permitting such images to be taken or distributing or publishing such images – for example on social media. It is important to note that if the person taking the image or having the image taken is under 18 an offence is committed by both parties. Indecent images may include not only naked images, topless images of girls, but also images in underwear and sex acts.

Potential Signs of Sexual Abuse

- Bruises, scratches, burns or bite marks
- Sexual awareness inappropriate to the child’s age
- Attempts to teach other children about sexual activity
- Aggressiveness, anger, anxiety, tearfulness
- Scratches abrasions or persistent infection in the anal or genital areas
- Pregnancy
- Frequent public masturbation
- Withdrawal from friends
- Refusing to stay with certain people or go to certain places

Neglect

The persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger;

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

Potential signs of neglect

- Constant hunger
- Inappropriate clothing
- Untreated medical problems
- Poor social relationships
- Constant tiredness
- Poor personal hygiene
- Frequent lateness or non-attendance
- Low self-esteem
- Compulsive stealing or scrounging

Bullying:

Bullying can be defined as using deliberately hurtful behaviour, usually over a period of time, where it is difficult for those bullied to defend themselves. The four main types of bullying are:-

- Physical
- Verbal
- Emotional
- Cyber

All incidents of bullying should be dealt with by the class teacher in the first instance, followed by the Year Head and /or the Head of Pastoral Care/DSL as appropriate. More detailed guidance can be found in the school's Anti-Bullying Policy (5.4).

Bullying (of any form) and abuse are closely linked issues. If a child discloses abuse by another student or students this must be dealt with in the same way as allegations or suspicions of abuse detailed in this policy.

Other forms of abuse

In addition to the above forms of abuse, the following should be borne in mind when considering potential harm to children. Statutory guidance is available on the following from the links in KCSIE.

- Children missing education and from home or care
- Child sexual exploitation (CSE)
- Domestic violence
- Drugs (County Lines)
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage
- Gender based violence / violence against women and girls (VAWG)

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- Fabricated or induced illness
 - Gangs and youth violence
 - (So – called) Honour based violence
 - Hate
 - Upskirting
 - Mental Health

Self-harm

Self-harm may be a significant indicator of abuse or bullying. All cases of observed, reported or suspected self-harm should be referred to the DSL without delay. Please refer to the mental health and wellbeing policy 4.4.

Serious violence

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. Statutory guidance is listed in appendix 5

Appendix 2 - The Seven Golden Rules to Sharing Information

1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from the DSL, her deputies or the data protection lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where children or others may be at risk of harm. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear about the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.

5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.

6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (see principles).

7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

Appendix 3 - Contact Information (External Agencies)

Contact	Telephone or contact
North Somerset Safeguarding Children Partnership (Previously North Somerset Safeguarding Children Board).	https://www.northsomersetsafeguarding.co.uk/children-safeguarding-board 01934 888808
North Somerset Council's social care Referral and assessment team Single point of access. Emergency duty team – evening and weekends	01275 888 801 01275 888 808 01454 615 165
DOFA (designated officer for the Local Authority).	01275 888 211 DOFA@n-somerset.gov.uk
Somerset County Council	0300 123 2224
The Disclosure and Barring Service (DBS) for referrals and safeguarding matters	01325 953 795
Teaching Regulatory Authority	02075935393 misconduct.teacher@education.gov.uk
The Charity Commission (reporting serious incidents)	RSI@charitycommission.gsi.gov.uk

Police (non-emergency number)	101
Dfe dedicated telephone helpline and email address for non-emergency advice for staff and governors	0207 340 7264 Counter-extremism@education.gsi.gov.uk
Channel (agency to protect vulnerable people being drawn into terrorism).	0207 493 9333 and 0207 493 9333 channelsw@avonandsomerset.pnn.police.uk info@counterextremism.org
Independent School's Inspectorate	0207 600 0100 info@isi.net
NSPCC's Whistleblowing Helpline – available for staff who do not feel able to raise concerns regarding child protection failures internally – available 8am – 8pm Monday to Friday	help@nspcc.org.uk 0800 028 0285
The Charities Commission	http://forms.charitycommission.gov.uk/contact-us/

Appendix 4 - Related Policies

The following policies relate to the contents of this policy.

- 1.2 Missing Child Policy and Procedure
- 1.2a Missing Child Policy and Procedure
- 1.4 Uncollected Child Procedure (Junior School)
- 2.2 Staff / Student Code (Staff behaviour policy)
- 2.10 Supervision of Students
- 2.10a Supervision of Students (Junior School)
- 3.13 Letting and hire of facilities
- 4.1 Medical Policy
- 4.4 Mental Health and Wellbeing
- 5.4 Anti-bullying Policy (including cyber-bullying)
- 5.6 Drugs, alcohol, smoking
- 5.7 Physical Restraint Policy
- 5.10 Search and Confiscation Policy
- 7.1 PHSE Policy
- 7.3 Sex and relationships
- 9.8 Discipline Rules and Procedure (staff)
- 9.26 Providing references Policy
- 9.9 Whistleblowing Policy
- 9.14 Volunteers Policy

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- 9.27 Supervision of Staff Policy
 - 9.30 Adults Staying with Resident Staff Policy
 - 12.1 Digital Safety Policy
 - 12.2 Digital Security Policy
 - 12.3, 12.4.12.5 Acceptable use policies

Appendix 5 - References

This policy has been drawn up with regard to the following:

- The Education (Independent Schools Standards) (England) Regulations 2014
- The Education Act, 2002
- Safeguarding Vulnerable Groups Act, 2006
- 'Keeping Children Safe in Education', DfE, September 2020 and interim updates Safeguarding and Remote Working and Covid19 safeguarding in schools
- 'Working together to Safeguard Children', DfE, 2019
- The ISI Handbook for the inspection of schools (Commentary on the regulatory requirements) – September 2019
- Statutory Framework EYFS, DfE, 2012 revised 2014
- Information Sharing – Advice for practitioners providing safeguarding services to children, young people, parents and carers July 2018
- The United Nations Convention on the Rights of the Child, UNICEF, 1989. Articles 19, 34, 39.
- The Teacher Standards, DfE, 2011 introduction updated 2013
- The National Minimum Standards [for Boarding Schools], DfE, 2015
- The Children Act 1989
- Framework for the Assessment of Children in Need and their Families, Dept. of Health, DfE, Home Office, 2000
- 'What to do if you're worried a child is being abused', DfE, 2015
- North Somerset Safeguarding Children Partnership South West Child Protection Procedures website: www.onlineprocedures.co.uk/swcpp/
- The Childcare Act, 2006 [the legal basis for EYFS]
- The Practice Guidance for the Early Years Foundation Stage, DCSF, 2008
- Multi-Agency Practice Guidelines on FGM -, H.M. Government, April 2016
- Guidance: Forced Marriage, F. & C. O. and Home Office, last updated June 2015
- What to do if you suspect a child is being sexually exploited, DfE, 2012
- Disqualification under the Childcare Act 2006
- Counter – Terrorism and Security Act 2015 (sections 26 and 29)
- The Prevent Duty Guidance for England and Wales (March 2015) and the Prevent Duty Guidance departmental advice for schools and childminders (June 2015).
- The use of social media for on-line radicalisation (July 2015).
- National action plan to tackle child abuse linked to faith or belief, DfE, 2012
- Guidance: Domestic violence and abuse, Home Office, updated March 2015
- Reporting serious incidents: guidance for charity trustee, The Charity Commission, 2019
- guidance <https://www.gov.uk/whistleblowing>
- Sexting in schools and colleges - Responding to incidents and safeguarding young people (UKCCIS)

- Children Missing in Education DfE 2016
- Sexual Violence and Sexual Harassment between children in schools and colleges DfE May 2018
- <https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/harmful-sexual-behaviour/>
- <https://www.cps.gov.uk/legal-guidance/safeguarding-children-victims-and-witnesses>
- Preventing youth violence and gang involvement (Home Office) August 2013
- Criminal exploitation of children and vulnerable adults – county lines guidance – September 2018
- When to call the Police NPCC 2020

Document Change History – document any changes since adoption on 09.10.2015

Date of change	Detail significant changes and any new legislation / guidance taken into account
23.04.2015	1.5 Job Descriptions inserted for Deputy DSLs. 4.2 No differentiation between children in need / children at risk in terms of no requirement to have parental consent for contact to be made with social care. 5.3 insertion of the word “immediate” regarding referral to DOFA. 5.17.2 Insertion of the word “promptly” regarding legal duty to refer to refer to DBS / the police. 5.23 re retention of documentation arising from allegations against staff amended to 60 years from 10 years.
5.09.2016	Updated in line with new version of Keeping Children Safe in Education (May 2016) and the September 2016 version of ISI Handbook for the Inspection of Schools – Commentary on regulatory requirements. All references to “pupils” replaced with “students.” Paragraphs reordered to make policy more accessible. 1.5 and 1.8 Key contacts updated and all designated persons inserted. Cross reference to hiring and lettings policy 2.2 reference to prompt action 2.7 reference to particular categories of student particularly vulnerable to bullying Reference to annual training updates for staff re notification of changes New flow chart inserted from updated version of KCSIE. Paragraph 4 Reordered to make procedures for staff clearer. Paragraph 5 Personal duty on teaching staff to report FGM to the police Missing and lost children procedures separated out for clarity –

	<p>information re uncollected children inserted into separate policy for snr school (1.4) updated in light of KCSIE 2016 and ISI regulatory handbook. Whistleblowing policy removed and cross referenced to separate policy. Reference to NSPCC helpline.</p> <p>Appendices reordered. Appendix 1 abuse redefined in accordance with KCSIE September 2016. App 2 contacts updated App 4 – related policies section updated, Existing flow chart removed and inserted into main body of policy</p> <p><i>Changes approved by Chair of Governors and Governor with responsibility for safeguarding.</i></p>
8.10.2016	Revised policy adopted by Board of Governors at Annual Safeguarding Review.
09.02.2017	References updated in line with changes to digital security policies, deletion of some duplication. Time for retention of documentation re child protection concerns extended to indefinite in line with digital security policy.
20.04.2017	Addition to para 18 and Appendix 1 to give greater prominence to “sexting” offences.
22.06.2017	Paragraph 2 – clarification in Paragraph 2, “Scope”, that this policy applies to those in regulated activity.
07.10.2017	<p>2.7 Recognition of gender issues as per KCSIE.</p> <p>4.10 Ensure transfer of any child protection file as soon as possible, in the event that a student leaves for another school</p> <p>11.13.5 Clarification of the interrelation of the disciplinary policy</p> <p>11.13.6 Review to be undertaken in the event that an allegation is substantiated to prevent reoccurrence of similar events in the future.</p> <p>17 Informal training updates to be provided to staff</p>
27.04.2018	<p>Policy reviewed in the light of Dfe 2017 guidance “Sexual violence and sexual harassment between children in schools.”</p> <p>2.6 confirmation that policy applies if alleged incident takes place between students off school premises</p> <p>6.5 Options available to the DSL in terms of appropriate courses of action</p>

	<p>9. Minor amendments to the procedure for staff where a child alleges possible abuse</p> <p>9.5.6 Staff should not assume that someone else is dealing with the alleged incident and should report it, if in doubt.</p> <p>10.6 Response to the perpetrator’s behaviour will be on a case by case basis</p> <p>10.7 Liaison with parents as appropriate</p> <p>11.35.2, and 3 – further detail around support for students who have made an allegation – including immediate risk assessment to be undertaken.</p> <p>17 Reference to training for staff regarding sexual violence and harassment between children</p> <p>19 Further detail regarding support for students who have been abused</p>
22.06.2018	<p>Reviewed by Board</p> <p>Policy updated to reflect changes to May 2018 DFE guidance – Sexual violence and sexual harassment in schools</p> <p>The terms “victim” and “perpetrator” replaced with “children”</p> <p>Para 2.7 Further guidance re children with SEND and who are, or perceived to be, LGBT.</p> <p>Para 6.5 Reporting to the police – if the child is less than 10 years of age (the age of criminal responsibility) the matter will still be reported to the police, who are to adopt a welfare rather than criminal response.</p> <p>Para 10.6 and 10.7 Inclusion of contextual safeguarding,</p> <p>Para 19.5 Regardless of whether the police take action, the School will continue to support the child who feels that they have suffered abuse</p> <p>Consider what support should be offered to the student who is alleged to have carried out the behaviour – depending on the context, severity, and the application of the disciplinary policies.</p>
01.09.2018	Updated in line with Keeping Children Safe in Education 2018

	<p>1.1 “Safeguarding is everyone’s responsibility” moved to afford it greater prominence.</p> <p>4.3 “Staff should not assume that somebody else will take action, and must share any information appropriately to ensure that a child is kept safe.”</p> <p>4.10 – The DSL will “adopt a contextual approach to safeguarding which takes account of wider environmental factors.”</p> <p>4.10 – The DSL will ensure that child protection files are transferred to a new school, “the School understands and appreciates that the sharing of relevant information with any new school/college is important, and can be vital to support the secure transition of a child.”</p> <p>6.3 Data protection law will not prevent information sharing in appropriate cases to safeguard a child.</p> <p>6.6 The signs of a child who may need “Early Help” are included</p> <p>11.14 – New category of an “unfounded allegation.”</p> <p>11.18 If the School ceases to use the services of a member of staff (or a governor or volunteer) because they are unsuitable to work with children, there will be a prompt and detailed report to the Disclosure and Barring Service (DBS) (irrespective of whether the individual has been deployed to an area of work not within the scope of regulated activity)</p> <p>References to NCTL updated to TRA</p> <p>11.23 – References to Disqualification by association removed.</p> <p>17. Induction for staff to include Part V of KCSIE</p>
06.10.2018	Reviewed and adopted by Board of Governors at Annual Safeguarding Review.
30.04.2019	Updated contact details for the designated officer for the local authority (DOFA).
21.06.2019	<p>Additional paragraph include, approved by Board.</p> <p>11.24 Providing references</p>

	<p>Only line managers may provide a reference for a member of staff, they must adhere to the providing references policy. Failure to do so is likely to constitute a disciplinary matter.</p>
02.09.2019	<p>Updated in line with Keeping Children Safe in Education 2019</p> <p>1.5 Key contacts updated</p> <p>2.7 reference to “upskirting” (definition included)</p> <p>References to the North Somerset Safeguarding Children Board replaced with North Somerset Safeguarding Children Partnership</p> <p>4.10 definition of contextual safeguarding amended to include factors, “which are present in a child’s life which are a threat to their safety or welfare”</p> <p>4.11 – process for staff reporting concerns amended in line with the adoption of the “My Concern” programme</p> <p>5 – Expectations of staff members amended in line with Keeping children safe in education to include:</p> <p>Adopting a child-centred approach at all times – this means that they should consider at all times consider what is in the best interests of the child</p> <p>Needing to understand the basic principles of information sharing as appropriate</p> <p>Being clear on the school’s policy with regarding to peer on peer abuse and bullying</p> <p>Being aware of the indicators which may signal that children are at risk from, or are involved with violent crime</p> <p>10.1 Guidance around what may constitute peer abuse</p> <p>11.1 Removed due to duplication</p> <p>Appendix 1 – paragraph included around “serious violence” in line with KCSIE 2019</p> <p>Appendix – Safeguarding Concern Form deleted (in view of use of MyConcern)</p> <p>Appendix 5 – References updated</p>

5 October 2019	Policy reviewed and adopted by Board at Annual Safeguarding Review.
2 January 2020	Additional paragraph inserted at paragraph 6.8 to cover information sharing when a child is not enrolled as a student at the school but attends holiday club.
25 January 2020	Change approved by Governors
2 April 2020	COVID-19 school closure arrangements for Safeguarding and Child Protection Addendum
10 October 2020	<p>Reviewed and approved at Annual Safeguarding Review by Full Board of Governors</p> <p>Contact details updated</p> <p>Para 2.9 – specific reference to mental health being a possible indicator of safeguarding issues</p> <p>Para 3.1 – definition of abuse extended to specifically cover mental and physical health</p> <p>Para 12.1 additional bullet point regarding allegations against staff members where there is an incident in school which may indicate that they are unsuitable to work with children</p> <p>Paragraph 12.2 confirming that procedure regarding allegations against staff includes supply staff</p> <p>Page 16 Definition of CSE broadened</p> <p>Covid addendum updated (re attendance monitoring, training and induction, online supported learning and reformatted to avoid repetition elsewhere in the policy).</p>
