**Safeguarding and Child Protection Policy**



**This policy applies to the whole school.**

**This Policy is publicly available on the School website and a copy may be obtained from the School Office.**

Our School takes its responsibilities for personal data very seriously, and has a policy in place to ensure compliance with the Data Protection Act 2018 incorporating the General Data Protection Regulations (GDPR). The data collected when dealing with any safeguarding or child protection issue is defined by the Data Protection Act 2018 as “special category data”.

This is the most sensitive category of data and as such it is essential that every care is taken to keep the data secure.

However, the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 does not prohibit information about children being shared with specific authorities **if it is for the purposes of safeguarding children and individuals at risk. Information that could be relevant to keeping a child safe should be shared so that informed decisions can be made about a child’s welfare**. We have a duty of care for our pupils/ students and safeguarding is of upmost importance to us.

All staff involved in collecting and processing data relating to Safeguarding and Child

Protection must ensure they have read, they understand and operate according to the school’s Data Protection policy.

1. **Introduction**

Schools and their staff form part of the wider safeguarding system for children. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.

(**Keeping Children Safe in Education – DfE, 2019)**

This Child Protection and Safeguarding policy is for all staff, parents, members of the Advisory Board, volunteers and the wider school community. It forms part of the safeguarding arrangements for our school and should be read in conjunction with the following:

* Keeping Children Safe in Education (DfE, 2019)
* the school Behaviour policy;
* the school Staff Code of Conduct);
* the safeguarding response to children missing from education
* the role of the designated safeguarding lead (Annex B of KCSIE September 2019)

Safeguarding and promoting the welfare of children *(everyone under the age of 18)* is defined in Keeping Children Safe in Education as:

* Protecting children from maltreatment
* Preventing impairment of children’s health or development
* Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
* Taking action to enable all children to have the best outcomes

**Contents:**

1. Promotion of this Policy and statement.
2. Statutory requirements
3. Monitoring and Review:
4. Safeguarding contact list
5. Roles & Responsibilities
6. Types of Abuse/Specific Safeguarding Issues
7. Child Protection Procedures
8. Supporting Pupils at risk
9. Children with Special Educational Needs and Disabilities: (SEND)
10. Promoting positive mental health and resilience in school
11. How to respond if a child confides in you (With Disclosure)
12. What to do if you suspect a child is being abused (Without Disclosure)
13. Records to be made following a Disclosure/Suspicion of Abuse
14. Confidentiality
15. Allegations against Members of Staff
16. Disciplinary, Grievance Procedures
17. Whistleblowing
18. Miscellaneaous
    * Admissions and Attendance
    * Staff Code of Conduct
    * Health & Welfare
    * Use of Reasonable Force
    * Visiting Speakers
    * Success Criteria - Monitoring

* Appendix A - Safeguarding/Cause for Concern Record Sheet
* Appendix B - Visiting speaker checklist
* Appendix C - National framework triangle
* Appendix D - Declaration for staff
* Appendix E - The Channel process

**A. Promotion of this Policy and statement.**

At The Tutorial Foundation we offer a nurturing, caring family environment for our children. **Our aim is to fire the imagination of children while strengthening their skills, developing confidence in themselves and their abilities."**

We aim to create a friendly, caring and perceptive environment in which every individual is valued. Our mission is to contribute positively towards the growing autonomy, self-esteem and safety of each pupil. We prepare all of our pupils to make reasoned, informed choices, judgments and decisions. Pupils are taught about safeguarding, including on-line, through the curriculum and designated Pastoral lessons.

**The Tutorial Foundation is committed to Child protection and Safeguarding and promoting the welfare of children and young people and expects all staff, visitors and volunteers to share this commitment. Maintaining a strong culture of safety is everyone’s responsibility**

This Child Protection and Safeguarding Policy is available to all parents and pupils via the School website and printed copies are available upon request.

In this policy, **‘child’** and **‘children’** are used throughout. These are intended to **refer to pupils of all ages**. It is the responsibility of all staff, including volunteers and staff of contractors to have read and be fully aware both of **Part - 1 of Keeping Children Safe in Education, September 2019** and the School’s procedures in relation to child protection and child safeguarding contained in this policy.

Where concerns arise about the safety, welfare or well-being of a student who is over the age of 18 contact with parents/carers will be made in accordance with the School’s home-school and learner agreements

**B. Statutory framework**

The Children’s Acts 1989 and 2004 (as amended 2004 section 52) The Children Act 1989 introduced the concept of significant harm as the threshold which justifies compulsory intervention in family life in the best interests of children Under Section 17 (10) of the Children Act 1989, a child is in “need” if:

* He/she is unlikely to achieve or maintain, or have the opportunity of achieving or maintaining, a reasonable standard of health or development without the provision for him/her of services by a local authority;
* His/her health or development is likely to be significantly impaired, or further impaired, without the provision for him/her of such services; or
* He/she is disabled.

This Policy is publicly available on the School website and applies to all members of staff including volunteers and members of the Advisory Board. It is developed from legislation documents:

The Children Act 2004, Education Act 2011, and complies with Working Together to Safeguard Children (July 2018), Keeping Children Safe in Education (KCSIE)(September 2019), Channel Duty Guidance (2015), What to do if you’re worried a child is being abused - advice for practitioners (March 2015), [What to do if worried a child is being abused” (March 2015)](https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2)” [“Information Sharing: Advice for practitioners](https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice) providing safeguarding

services to children, young people, parents and carers (July 2018), Guidance for safer working practice for those working with young people in education settings (October 2015), Disqualification under the childcare act 2006 (August 2018), Prevent Duty Guidance for England and Wales (July 2015), The use of social media for on-line radicalisation (July 2015), Information Sharing (2018) and any additional guidance issued by the Secretary of State. Ofsted Guidance and procedures produced by the Bromley Safeguarding Children Board (LSCB) and the Local Authority Safeguarding Children Board are also followed.

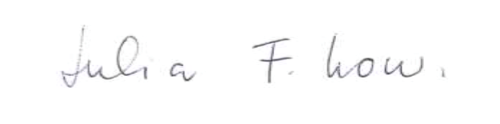
This policy should also be read in conjunction with the Safer Recruitment Policy, Behaviour and Exclusion Policy, Anti-Bullying Policy, Code of Conduct/Staff Behaviour Policy, E-safety and ICT Acceptable Usage Policy.

It is the responsibility of all staff, including volunteers, the Advisory Board and staff of contractors to be fully aware both **of Part 1 Keeping Children Safe in Education, September 2019 including Annex A and Annex B**, and the School’s procedures in relation to child protection and child safeguarding. All staff are given a copy of this during their induction day as well as the school’s Safeguarding and Child Protection Policy. Staff Code of Conduct (part of the employment), the school’s Behaviour and Attendance (including Children Missing Education) policies. These policies must be read. **Part 1 of KCSIE September 2019** must be read and signed ‘**as read’ and “understood**” by all staff. Safeguarding training including Prevent awareness and online safety are part of the school’s annual INSET programme.

**C. Monitoring and Review:**

This policy is subject to continuous monitoring, refinement and audit by the Headteacher, the Designated Safeguarding Lead (DSL) and the Advisory Board.The Headteacher will undertake a full annual review of this policy and procedures, inclusive of its implementation and the efficiency with which the related duties have been discharged. This discussion will be formally documented in writing. This policy will be reviewed no later than September 2019, or earlier if changes in legislation, regulatory requirements or best practice guidelines so require. Any deficiencies or weaknesses recognised in arrangements or procedures will be remedied immediately and without delay.

Signed and Date Signed and Date



Screen Shot 2016-01-12 at 11

**Julia Low (Headteacher & Proprietor). Karen Turner (Proprietor).**

**D. Safeguarding Contact List**

All adults working with or on behalf of children have a responsibility to protect them and to provide a safe environment in which they can learn and achieve their full potential.  However, there are key people within schools and the Local Authority who have specific responsibilities under child protection procedures.  The names of those in our school with these specific responsibilities (the designated safeguarding lead and deputy designated safeguarding lead) are listed below.

|  |  |
| --- | --- |
| **PERSON RESPONSIBLE FOR POLICY:** | **Julia Low** |
| **APPROVED:** | **2ND SEPTEMBER 2019** |
| **SIGNED:** | **JULIA LOW** |
| **SHARED WITH STAFF** | **3RD September 2019** |
| **TO BE REVIEWED:** | **Date Policy to be reviewed October 2020 or earlier to reflect any changes in legislation.** |

**At the Tutorial Foundation School the named personnel with designated responsibility for safeguarding are**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Designated Safeguarding Lead** | **Deputy Designated Safeguarding Lead** | **Deputy Designated Safeguarding Lead** | **Deputy Designated Safeguarding Lead** | **Deputy Designated Safeguarding Lead** |
| **Julia Low**  [**sen@thetutorialfoundation.co.uk**](mailto:sen@thetutorialfoundation.co.uk)  **020-8460-0181 ext. 3** | **Marion Veal**  [**marionvealttf@outlook.com**](mailto:marionvealttf@outlook.com)  **020-8460-0181 ext. 3** | **Emma Clyde**  [**emmaclydettf@outlook.com**](mailto:emmaclydettf@outlook.com)  **020-8460-0181 ext. 3** | **Sharon Oakes**  [**sharonoakesttf@outlook.com**](mailto:sharonoakesttf@outlook.com)  **020-8460-0181 ext. 3** | **Lily Truong**  [**lilytruongttf@outlook.com**](mailto:lilytruongttf@outlook.com)  **020-8460-0181 ext. 3** |
| DSCN0013 | DSCN0014 |  |  |  |

**The named personnel with Designated Responsibility regarding allegations against staff are:**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Designated Senior Manager**  **(The Headteacher)** | **Deputy Designated Senior Manager (Joint proprietor)** | | **Member of the Advisory Board** | **Chair of the Advisory Board (in the event of an allegation against the Headteacher)** |
| **Julia Low**  [**sen@thetutorialfoundation.co.uk**](mailto:sen@thetutorialfoundation.co.uk)  **020-8460-0181 ext. 3** | **Karen Turner**  [**accounts@thetutorialfoundation.co.uk**](mailto:accounts@thetutorialfoundation.co.uk)  **020-8460-0181 ext 1** | | **Tim Low**  [**timlowttf@outlook.com**](mailto:timlowttf@outlook.com)  **020-8460-0181 ext. 3** | **Jacqueline Jenkins**  [**sen@thetutorialfoundation.co.uk**](mailto:sen@thetutorialfoundation.co.uk)  **020-8460-0181 ext. 3** |
| **DSCN0013** | DSCN0016 | | DSCN0018 |  |
| **LADO - Bromley**  **Rita Dada - Lead Officer for Education Safeguarding**  [**bscb@bromley.gov.uk**](mailto:bscb@bromley.gov.uk)  **020-8461-7669** | | **LADO and Safeguarding Contacts for other Local Authorities see Safeguarding Contacts displayed in the Office and can also be found under Our Policies & Safeguarding on our web-site.**  **Includes (but is not exclusive) Bromley; Lewisham; Croydon; Kent & Lambeth** | | |

**Agency Responsibility and Statutory Provision in Child Abuse**

|  |
| --- |
| Bromley Safeguarding Partners … [www.bromleysafeguarding.org](http://www.bromleysafeguarding.org) |
| St Blaise, Room B40a, Civic Centre, Stockwell Close, Bromley, BR1 3UH |
| [BSCB@bromley.gov.uk](mailto:BSCB@bromley.gov.uk) |
| 020 8461 7816 / 020 8313 4324 |
|  |
| **Multi-Agency Safeguarding Hub (MASH) Telephone: 020 8461 7373 / 7379 / 7026 Address: Civic Centre, Stockwell Close, Bromley, BR1 3UH Email: mash@bromley.gov.uk mash@bromley.gcsx.gov.uk (secure) Out of Hours Duty Service: 0300 303 8671** |
|  |
| Gemma Taylor – Local Authority Designated Officer (LADO) 020 8461 7212 |
|  |
| ***OFSTED: 0300 123 1231*** |
| ***These procedures have been produced in accordance with DFE and LSCB Guidelines:*** |
| ***• Working Together to Safeguard Children July 2018*** |
| ***• Keeping Children Safe in Education (September 2019 )*** |

**E. Roles and responsibilities**

**The Advisory Board**

The Advisory Board ensures that the policies, procedures and training in our school are effective and comply with the law at all times. It ensures that all required policies relating to safeguarding are in place, that the child and safeguarding protection policy reflects statutory and local guidance and is reviewed at least annually.

The Advisory Board member for safeguarding arrangements is Tim Low. This member of the Advisory Board takes leadership responsibility for safeguarding arrangements in our school. The Advisory Board ensures there is a named designated safeguarding lead and at least one deputy safeguarding lead in place. The names are listed above.

The Advisory Board ensures the school contributes to inter-agency working, in line with statutory and local guidance. It ensures that information is shared and stored appropriately and in accordance with statutory requirements.

The Advisory Board ensures that all staff members undergo safeguarding and child protection training at induction and that it is then regularly updated. All staff members receive regular safeguarding and child protection updates, at least twice a year, to provide them with the relevant skills and knowledge to keep our children safe.

The Advisory Board ensures our pupils are taught how to keep themselves safe (including online) through teaching and learning opportunities as part of a broad and balanced curriculum. From September 2020, our school will work in accordance with new government regulations which make the subjects of Relationships Education (for primary age pupils) and Relationships and Sex Education (for secondary age pupils) and Health mandatory.

The Advisory Board and school leadership team are responsible for ensuring the school follows recruitment procedures that help to deter, reject or identify people who might abuse children. It adheres to statutory responsibilities to check adults working with children and has recruitment and selection procedures in place **(see the school’s ‘Safer Recruitment’ policy for further information)**. It ensures that volunteers are appropriately supervised in school.

**The Designated Safeguarding Lead**

**Duty of the DSL (Designated Safeguarding Lead) – Julia Low**

Julia Low, the Headteacher, (DSL) is appointed with overall responsibility for child protection and safeguarding for the whole school.

The responsibilities of the DSL include: managing referrals, working with other professionals and agencies (including LSCB), keeping up to date with relevant training, keeping staff up to date with relevant safeguarding training, maintaining a secure awareness of child protection and safeguarding, maintaining accurate records, transferring records. **The DSL has a specific job description which mirrors Annex B in Keeping Children Safe in Education (September 2019).**

**Please refer to Annex B KCSIE**

The actions taken will keep the welfare of all pupils at the forefront by:

* Implementing the Tutorial Foundation Child Protection and Safeguarding Policies
* Being available term time during school hours (or the deputy DSL in their absence) for staff or volunteers to discuss any safeguarding concerns
* Ensuring a review process is in place for all Child Protection and Safeguarding Policies
* Being responsible for and undertake training every two years.
* Working with protocols and the Safeguarding partners approach to the Prevent Duty
* Ensuring up to date Prevent Duty awareness has been completed
* Providing training for all staff in line with advice from Bromley Safeguarding Children Board and independent Schools advice and when new legislation is received.
* Taking into account the nature and the seriousness of the suspicion or complaint
* Concerns regarding a Child in Need will be reported to the DSL by staff and will in turn be reported on to Children’s Social Care (in line with KCSIE September 2019).
* **Concerns regarding a Child at Risk will be reported to the DSL by staff and will in turn be reported on to Children’s Social Care and/or the Police if a crime has been committed. This will be reported within 1 working day, or … a referral may be made directly by staff to Social Care or the Police.**
* Ensuring a complaint involving a serious criminal offence will always be referred to Children’s Social Care or the police without further investigation within the school
* Considering the wishes of the pupil who has disclosed, although a serious situation would override their wishes
* **Schools should have at least two emergency contacts for every child in the school in case of emergencies, and in case there are welfare concerns at home. The DSL is responsible for ensuring this is in place**
* Considering the wishes of the parents of the pupil who has disclosed, although a serious situation would override their wishes
* Being easily contactable in emergency situations during school hours via the Child Protection and Safeguarding mobile phone. **The number is available to all staff 07583 147696**

**The Designated and Deputy Safeguarding Leads will meet regularly with the Advisory Board and safeguarding leadership team to discuss safeguarding issues including outcomes and implementation of actions.**

If for any reason the designated safeguarding lead is unavailable, the deputy designated safeguarding lead will act in their absence*.*

**The Headteacher**

The Headteacher works in accordance with the requirements upon all school staff. In addition, she ensures that all safeguarding policies and procedures adopted by the governing body are followed by all staff.

**The Head Teacher will also ensure that:**

* There is an open and honest culture in which everyone is confident in reporting incidents and suspicions relating to keeping children safe from harm.
* There is effective and full assessment of students on admission to The Tutorial Foundation with full information about any abusive history
* There is clear written procedural guidance and regular effective training for all school staff on safeguarding. These would include guidance and training on disclosures, contacts between children, contacts between staff and children, supervision of children and staff, confidentiality, policy on lone working and behaviour support and restraint.
* Training for staff will be provided regularly and at least annually, and on induction by external representatives from/approved by Bromley Safeguarding Partners and by the Head Teacher and other designated Safeguarding Officers at the school. Members of the school’s safeguarding team will receive updated training, particularly in Child Protection every two years. The child protection training will be multi-agency, in line with “Keeping Children Safe in Education” (September 2019) and “ Keeping Children Safe in Education information for schools and colleges “
* All required paper and electronic forms for incidents, occurrences and safeguarding issues are kept in the school administrator’s office.
* The school follows protocols set out in the Bromley Safeguarding Partners guidance and works effectively with the local authority, social services, the police and parents and carers.
* Rapid, appropriate and effective action is taken in relation to every report about a child suffering abuse.
* All staff and volunteers have enhanced criminal records clearance and other required checks before they are allowed to work with children.
* A single register is kept by the Headteacher, it is kept securely locked away together with all safeguarding concerns and actions taken. Only the DSL and those who deputise in that role have access to this.
* An annual report on all safeguarding concerns is given when and where appropriate.
* All prospective parents will be given a copy of the safeguarding policy upon enquiry for a place at The Tutorial Foundation
* The designated teacher for Looked After Children is the Head Teacher.

**All school staff**

Everyone in our school has a responsibility to provide a safe learning environment in which our children can learn. Any child may benefit from early help and all staff members are aware of the local early help process and our role in it. They are aware of signs of abuse and neglect so they are able to identify children who may be in need of help or protection. All staff members are aware of and follow school processes (as set out in this policy) and are aware of how to make a referral to Social Care if there is a need to do so. If staff have any concerns about a child’s welfare, they must act on them immediately and speak with the designated safeguarding lead (or deputy) – **they do not assume that others have taken action**

**F. Types of abuse / specific safeguarding issues**

**Keeping Children Safe in Education (DfE, 2019) defines abuse as the maltreatment of a child.**

*“Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or another child or children”*

The four main types of abuse referred to in Keeping Children Safe in Education are:

* Physical
* Emotional
* Sexual
* Neglect

Our school is aware of the signs of abuse and neglect so we are able to identify children who may be in need of help or protection. All staff are aware of environmental factors which may impact on a child’s welfare and safety and understand safeguarding in the wider context **(contextual safeguarding).** Staff are aware of safeguarding issues that can put children at risk of harm and understand that behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting put children in danger.

**Peer on peer abuse**

Our school may be the only stable, secure and safe element in the lives of children at risk of, or who have suffered harm.  Nevertheless, whilst at school, their behaviour may be challenging and defiant, or they may instead be withdrawn, or display abusive behaviours towards other children. Our school recognises that some children may abuse their peers and any incidents of peer on peer abuse will be managed in the same way as any other child protection concern and will follow the same procedures. We will seek advice and support from other agencies as appropriate.

Peer on peer abuse can manifest itself in many ways. This may include bullying (including cyber bullying), physical abuse, sexual violence / sexual harassment, ‘up-skirting’, ‘sexting’ or initiation / hazing type violence and rituals. We do not tolerate any harmful behaviour in school and will take swift action to intervene where this occurs. We use lessons and assemblies to help children understand, in an age-appropriate way, what abuse is and we encourage them to tell a trusted adult if someone is behaving in a way that makes them feel uncomfortable. Our school understands the different gender issues that can be prevalent when dealing with peer on peer abuse.

* bullying including cyber-bullying
* 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.

**Please refer to our Anti –Bullying policy, prevention of and response to peer on peer abuse**

**Serious violence**

All staff are aware of indicators which may signal that children are at risk from or 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 well-being, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that a child has been approached by, or is involved with, individuals associated with criminal networks or gangs.

**Children with special educational needs and disabilities**

Our school understands that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Barriers can exist when recognising abuse and neglect in this group of children. This can include:

* Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s disability, without further exploration
* That they may be more prone to peer group isolation than others
* The potential to be disproportionally impacted by things like bullying, without outwardly showing signs
* Communication difficulties in overcoming these barriers

**Children missing from education**

All children, regardless of their age, ability, aptitude and any special education needs they may have are entitled to a full-time education. Our school recognises that a child missing education is a potential indicator of abuse or neglect and will follow the school procedures for unauthorised absence and for children missing education. It is also recognised that, when not in school, children may be vulnerable to or exposed to other risks, so we work with parents and other partners to keep children in school whenever possible.

Parents should always inform us of the reason for any absence. Where contact is not made, a referral may be made to another appropriate agency, Social Care or Police). Parents are required to provide at least **two emergency contact numbers to the school**, to enable us to communicate with someone if we need to.

**Our school must inform the local authority of any pupil who has been absent without school permission for a continuous period of 10 days or more.**

**Child Sexual Exploitation (CSE)**

Child Sexual Exploitation (CSE) is a form of child abuse, which can happen to boys and girls from any background or community. In Bromley, the definition of Child Sexual Exploitation (CSE) from the Department of Education (DfE, 2017) has been adopted:

*"Child Sexual Exploitation is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology".*

It is understood that a significant number of children who are victims of CSE go missing from home, care and education at some point. Our school is alert to the signs and indicators of a child becoming at risk of, or subject to, CSE and will take appropriate action to respond to any concerns. The designated safeguarding lead will lead on these issues and work with other agencies as appropriate.

|  |
| --- |
| **Child criminal exploitation**  Child criminal exploitation is a geographically widespread form of harm which is a typical feature of county lines criminal activity **(county lines is when drug networks or gangs groom and exploit children to carry drugs and money from urban areas to suburban areas and seaside towns).** Our school works with key partners locally to prevent and respond to child criminal exploitation.  **Contextual safeguarding**  Safeguarding incidents and behaviours can be associated with factors outside our school. All staff are aware of contextual safeguarding and the fact they should consider whether wider environmental factors present in a child’s life are a threat to their safety and / or welfare. To this end, we will consider relevant information when assessing any risk to a child and share it with other agencies to support better understanding of a child and their family.  **Domestic abuse**  Domestic abuse can take many forms, including psychological, physical, sexual, financial and emotional. Our school recognises that exposure to domestic abuse can have a serious, long-term emotional and psychological impact on children. We work with other key partners and will share relevant information where there are concerns that domestic abuse may be an issue for a child or family or be placing a child at risk of harm. |

**So-called ‘honour-based violence’ (including Female Genital Mutilation and forced marriage)**

**Female Genital Mutilation** (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to female genital organs. It is illegal in the UK and a form of child abuse.

As of October 2015, the Serious Crime Act 2015 (Home Office, 2015) introduced a duty on teachers (and other professionals) to notify the police of known cases of female genital mutilation where it appears to have been carried out on a girl under the age of 18. Our school will operate in accordance with the statutory requirements relating to this issue, and in line with local safeguarding procedures.

A **forced marriage** is one entered into without the full consent of one or both parties. It is where violence, threats or other forms of coercion is used and is a crime. Our staff understand how to report concerns where this may be an issue.

**Prevention of radicalisation**

As of July 2015, the [Counter-Terrorism and Security Act (HMG, 2015)](http://www.legislation.gov.uk/ukpga/2015/6/contents) placed a new duty on schools and other education providers. Under section 26 of the Act, schools are required, in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty.

As a school we teach a broad and balanced curriculum which promotes spiritual, moral, cultural, mental and physical development of pupils and prepares them for the opportunities, responsibilities and experiences of life and must promote community cohesion

* be safe spaces in which children / young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas
* be mindful of their existing duties to forbid political indoctrination and secure a balanced presentation of political issues

CHANNEL is a national programme which focuses on providing support at an early stage to people identified as vulnerable to being drawn into terrorism. Our school works in accordance with local procedures for PREVENT and with other agencies, sharing information and concerns as appropriate.

**Online Safety & E-Safety; Raising Awareness with Pupils (Please refer to Annex C KSCIE 2019.**

The term “**e-safety” i**s specifically defined for the purposes of this policy as the process of limiting the risks to pupils and staff when using **IDMT** (Internet Digital and Mobile Technologies) through a combined approach to policies and procedures, education and training.

Staff should be aware of the risks from potentially harmful and inappropriate online material. The breadth of issues classified within online safety is considerable, but can be categorised into three risk areas:

1. **CONTENT**: being exposed to illegal, inappropriate or harmful material e.g. pornography, fake news, racist or radical and extremist views;
2. **CONTACT**: being subjected to harmful online interaction with other users; e.g. commercial advertising as well as adults posing as children or young adults, and
3. **CONDUCT**: personal online behaviour that increases the likelihood of, or causes harm, e.g. making, sending and receiving explicit images, or online bullying.

**Annex C of KCSIE (Sept 2019) provides useful information and web links for teachers.**

**Teaching about safety and safeguarding.**

The School takes a proactive approach to teaching children about safety and safeguarding. In addition to PSHE, this is undertaken across the curriculum. As well as explicit teaching opportunities, staff use incidental opportunities to promote safe messages and teach about how to manage risk.

**Roles and Responsibilities of the Advisory Board and Headteacher.**

* Take overall responsibility for e-safety
* Ensures that staff receive suitable training to carry out their e-safety roles
* Ensure that the Tutorial Foundation School is an environment in which pupils can learn and staff can work safely whilst using IDMT
* Are aware of **the procedures** to be followed in the event of **a serious e-safety incident**

**E-Safety – risk of radicalisation**

The school ensures that children are safe from online terrorist and extremist and other inappropriate material, typically via appropriate levels of filtering. The Tutorial Foundation requires pupils and staff to abide by acceptable user polices which make clear that accessing such sites is unacceptable. Using school equipment to send terrorist publications to others would be a criminal offence.

The Headteacher and her staff will assess the school’s approach to keeping children safe from the dangers of radicalisation and extremism and what is done when the school suspects that pupils are vulnerable to these threats. If the school is considered to be failing in this regard or if their staff or children’s safety is threatened, the school will remedy any failing or be subject to regulatory action.

The school promotes the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs. This is incorporated in a curriculum including a balanced Religious Education, Personal Social and Health Education.

**E-Safety - Use of mobile phones, cameras:**

Staff should not use mobile phones or cameras in the presence of pupils. Personal mobile phones or cameras should never be used for taking or storing images or recordings of pupils. Any images or recordings should only be taken, edited or stored on school computers with the express permission of the Head. Photographs or recordings should only be made where there is a legitimate school purpose. A pupil’s privacy and dignity must be preserved at all times. Images or recordings should not be transmitted to third parties without permission of the Head or parents of the child involved. This guidance applies to all pupils.

**There is a separate policy on the use of Mobile Phones and Cameras and all staff must read the Mobile Phones and Cameras Policy in conjunction with the Child Protection and Safeguarding Policy.**

**E-Safety - Email, electronic communication and computers**

Staff will only use the School’s digital technology resources and systems for professional purposes or for uses deemed ‘reasonable’ by the Headteacher/Proprietor. Staff will only use the approved School email, or other School-approved communication-systems with pupils or parents/guardians/Carers, and only communicate with them on appropriate School business and will not disclose their personal telephone numbers and email addresses to pupils or parents/Guardians/ Carers.

All computer equipment and internet access within the School will be subject to appropriate “parental controls” and Internet safety rules in line with our E-safety Policy. Pupils, staff and parents will sign the Acceptable Use Policy, and regular mention of appropriate use of IT is made at staff training sessions.

**G. Child Protection Procedures**

Our school works with key local partners to promote the welfare of children and protect them from harm. **This includes providing a co-ordinated offer of early help** when additional needs of children are identified and contributing to inter-agency plans which provide additional support (through a ‘child in need’ or a ‘child protection’ plan).

All staff members have a duty to identify and respond to suspected / actual abuse or disclosures of abuse. Any member of staff, volunteer or visitor to the school who receives a disclosure or allegation of abuse, or suspects that abuse may have occurred **must** report it immediately to the designated safeguarding lead (or, in their absence, the deputy designated safeguarding lead).

All action is taken in accordance with the following guidance;

* Bromley Safeguarding Children Board guidelines -
* Keeping Children Safe in Education (DfE, 2019)
* Working Together to Safeguard Children (DfE, 2018)
* PREVENT Duty - Counter-Terrorism and Security Act (HMG, 2015)

Any staff member or visitor to the school must refer any concerns to the designated safeguarding lead or deputy designated safeguarding lead. Where there is risk of immediate harm, concerns will be referred by telephone to the Children and Families Hub and / or the Police. The school may also seek advice from Social Care or another appropriate agency about a concern, if we are unsure how to respond to it. Wherever possible, we will share any safeguarding concerns, or an intention to refer a child to Children’s Social Care, with parents or carers. However, we will not do so where it is felt that to do so could place the child at greater risk of harm or impede a criminal investigation. On occasions, it may be necessary to consult with the Children and Families Hub and / or Bromley Police for advice on when to share information with parents / carers.

If a member of staff continues to have concerns about a child and feels the situation is not being addressed or does not appear to be improving, the staff member concerned should press for re-consideration of the case with the designated safeguarding lead.

If, for any reason, the designated safeguarding lead (or deputy) is not available, this should not delay appropriate action being taken. Safeguarding contact details are displayed in the school to ensure that all staff members have unfettered access to safeguarding support, should it be required. **Any individual may refer to Social Care where there is suspected or actual risk of harm to a child.**

When new staff, volunteers or regular visitors join our school they are informed of the safeguarding arrangements in place, the name of the designated safeguarding lead (and deputy) and how to share concerns with them.

**Training and Support**

The Designated Safeguarding Lead (DSL) and Deputy DSLs will receive relevant training every year. This will include local interagency working protocols and the Bromley Safeguarding Children Board’s approach to the Prevent Duty.

**The DSL must:**

* Ensure up to date Prevent Duty awareness has been completed
* Provide training for all staff in line with advice from Bromley LA and when new legislation is received
* Ensure that all staff have read and understood Part One and Annex A and Annex B of KCSIE (September 2019)
* Carry out induction training for all new staff, including temporary staff and volunteers
* Keep up to date through research
* Be responsible for training and development of staff
* The Tutorial Foundation ensures all staff complete safeguarding and child protection training as part of their induction. We have a commitment to updating training for all staff each year.
* All staff and volunteers new to the school will be given appropriate Safeguarding training as part of their induction programme to the school.

**Support for and supervision of staff**

* All staff should feel comfortable and confident approaching the DSL, Deputy DSL or any other member of senior leadership about any safeguarding and/or pastoral care concerns, including in relation to unsafe practice (Please refer to the Whistleblowing policy). If a staff member would like additional support and/or training in order to fulfil their safeguarding responsibilities, including in identifying and/or handling concerns they should speak to the DSL who will work with the member of staff to ensure that they are adequately supported. Safeguarding and pastoral care responsibilities are a key part of staff appraisals and staff should use this process to build and improve their knowledge, confidence and experience in this area.
* The Designated Safeguarding Lead (DSL) will see all new staff/volunteers as part of their induction to explain the Child Protection/Safeguarding Policy and procedures.
* 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. Therefore the Designated Person is available for staff to talk through their anxieties and to seek further support as appropriate.

**Suitability of staff and safe recruitment practices** **of Staff and Volunteers**

The Tutorial Foundation recognises that safe recruitment practices are an essential part of creating a safe environment for children and young people. Consequently, we will ensure that staff and volunteers working at the school are suitable to do so, therefore, they do not pose any kind of risk to our students.

The School follows the Government’s recommendations for the safer recruitment and employment of staff who work with children **(Part 3 and Part 4 as prescribed in the Schedule to the Education (Independent School Standards) Regulations 2014. Please refer to Safer Recruitment guidelines DFE 2018).** All members of the teaching and non-teaching staff at the School including part time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the statutory child protection checks before starting work. This search highlights people who have a criminal record or if previous allegations have been made against them. If staff or prospective staff are found to have a criminal record or have been barred from with working with children or adults at risk, their appointment will be rejected and the relevant Local Authority and police informed.

The Head Teacher has undertaken appropriate training on Safe Recruitment and she is always the interviewer for recruitment.

The school is committed to safeguarding and promoting the welfare and safety of all children in its care and expects all staff to share this commitment. Enhanced criminal records checks will be required for all staff and volunteers. Enhanced criminal records checks are initiated and administered for the School by Chris Renew.

New staff are inducted into safeguarding practices by one of the DSL according to Bromley Safeguarding Partners induction guidelines. It is the responsibility of the Head Teacher to ascertain that new staff are familiar with procedures and policy, which affect the health and safety of all at school but especially the children.

Volunteers or work experience providers who have regular or 1:1 contact with our vulnerable children or young people must also have an Enhanced Criminal Records check.

Visitors to the School who do not have criminal records clearance will be accompanied by a member of staff on school premises **and under no circumstance be left alone with a child or group of children or young people.**

**Specific procedures are outlined in:**

* Our Safer Recruitment Policy ( **Please refer to the school Policy**)
* Appropriate members of senior leadership teams in the school are required to complete Safer Recruitment Training in order that one panel member on every selection panel is trained is ‘Safer Recruitment’. Online training can be obtained from the NSPCC website.

Keeping Children Safe in Education 2019 states that schools will be required to complete a risk assessment for each volunteer to decide whether they need to do an enhanced DBS check or not. However, if the volunteer is not in regulated activity, schools are not legally allowed to do a barred list check

**All staff are made aware of the boundaries of appropriate behaviour and conduct. These matters form part of staff induction and are outlined in the Staff Handbook / Code of Conduct/Behaviour Policy.**

* **All Child Protection training is recorded.** The Headteacher attends separate training and the whole staff will receive regular safeguarding training as appropriate, but which will occur at least once every three years and be conducted by the DSL or an external provider.
* New teachers, including volunteers with unsupervised access to pupils, and temporary staff will receive initial training on safeguarding issues from the DSL, as part of the induction process and before they have contact with pupils.
* Every new member of staff is provided with a copy of this Safeguarding Policy, it is available to all staff electronically on the School website, or in hard copy from the DSL.
* Support staff receive safeguarding training from the DSL, and the whole staff meet for training every year, organised by the DSL.
* Individual training on safeguarding issues is available through the CPD budget and staff can approach the Headteacher.

**H. Supporting Pupils at risk**

The Tutorial Foundation recognises that children who are abused or who witness violence may find it difficult to develop a sense of self-worth or view the world in a positive way. School may be the only secure and predictable element in the lives of children at risk. Whilst at school, their behaviour may still be challenging and defiant and there may even be moves to consider suspension or exclusion. It is also recognised that some children who have experienced abuse may in turn abuse others. **This requires a considered, sensitive approach in order that the child can receive appropriate help and support.**

**The School will endeavour to support pupils through:**

• **The curriculum** by encouraging self-confidence and self-motivation.

• The School ethos which promotes a positive, supportive and secure environment, which gives all pupils and adults a sense of being respected and valued.

• Implementation of School Rules. (Required under the Code of Practice, 1993 Education Act).

• A considered approach, which recognises and separates the cause of behaviour from that which the child displays. This is vital to ensure that all children are supported within the School setting.

• Regular liaison with other professionals and agencies who support pupils and their families.

• A commitment to develop productive, supportive relationships with parents, whenever it is in the child’s interest to do so.

• The development and support of a responsive and knowledgeable staff group, trained to respond appropriately in child protection situations.

• Active consultation with appropriate external welfare agencies including the reporting of any disclosure or suspicion of abuse **within 24 hours**.

**I. Children with Special Educational Needs and Disabilities: (SEND)**

Additional barriers can exist when recognising abuse and neglect in this group of children.

This can include:

* Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s impairment without further exploration;
* Assumptions that children with SEN and disabilities can be disproportionally impacted by things like bullying- without outwardly showing any signs;
* Communication barriers and difficulties,
* Reluctance to challenge carers , (professionals may over empathise with carers because of the perceived stress of caring for a disabled child),
* Disabled children often rely on a wide network of carers to meet their basic needs and therefore the potential risk of exposure to abusive behaviour can be increased,
* A disabled child’s understanding of abuse,
* Lack of choice/participation, / Isolation.
* The Tutorial Foundation will work with young people and children with a range of learning disabilities and difficulties. These include Autistic Spectrum Disorder (ASD), Asperger’s syndrome, dyslexia, dyspraxia, Attention Deficit Hyperactivity Disorder (ADHD), Attention Deficit Disorder (ADD), Oppositional Defiance Disorder (ODD), Behavioural, Emotional & Social Difficulties (BESD), some mental health difficulties and Speech & Language Difficulties, such as semantic pragmatic disorder. Many children and young people have identifiable combinations of some of these learning difficulties.

Working with groups of vulnerable children and young people such as these requires staff to adhere to robust safeguarding protocols for the protection of vulnerable children with challenging behaviours and for the protection of all staff and volunteers. **At The Tutorial Foundation, we are committed to excellence in safeguarding and child protection practice to support the welfare and progress of the children and young people with special needs in our care.**

**J. Promoting positive mental health and resilience in school**

Positive mental health is the concern of the whole community and we recognise that our school plays a key part in this. The Tutorial Foundation aims to develop the emotional wellbeing and resilience of all pupils and staff, as well as provide specific support for those with additional needs. We understand that there are risk factors which increase someone’s vulnerability and protective factors that can promote or strengthen resiliency. The more risk factors present in an individual’s life, the more protective factors or supportive interventions are required to counter balance and promote further growth of resilience.

It is vital that we work in partnership with parents to support the well-being of our pupils. Parents should share any concerns about the well-being of their child with school, so appropriate support and interventions can be identified and implemented

**Please refer to Mental Health and Behaviour in schools Departmental advice for school staff March 2016 DFE**

**K. How to respond if a child confides in you (With Disclosure**)

It can take a great deal of courage for a child to talk to an adult about abuse. The child may have to betray a person who is close to them, and loved by them and they are risking a great deal in the hope you will believe what they say.

Guiding Principles for all staff and volunteers for Dealing with Disclosures: The Seven R’s

The Seven R’s provides staff with clear guidance on how to act in the event of a concern or disclosure: **Receive, Reassure, Respond, Report, Record, Remember, Review.**

**Receive**

* Listen to what is being said, without displaying shock or disbelief.
* Accept what is said and take it seriously.
* Make a note of what has been said as soon as practicable.

**Reassure**

* Reassure the pupil, but only as far as is honest and reliable.
* Do not make promises you may not be able to keep, e.g.: “I’ll stay with you”, or “everything will be alright now” or “I’ll keep this confidential”.
* Do reassure, e.g.: you could say “I believe you”, “I am glad you came to me”, “I am sorry this has happened”, “We are going to do something together to get help”.

**Respond**

* Respond to the pupil only as far as is necessary for you to establish whether or not you need to refer this matter, but do not interrogate for full details.
* Do not ask ‘leading’ questions, i.e.: “did he/she hurt you?” Such questions may invalidate your evidence (and the child’s) in any later court proceedings.
* Instead, make use of open ended questions which offers the child the opportunity to provide more information about an event in a way that is not leading, suggestive or putting them under pressure. Open questions may use how? When? Who? Where?

Questions beginning with the phrases “tell me”, “describe” or “explain” are useful:

* Tell me what happened, tell me who was there.
* Explain what you mean when you say.
* Describe the place to me.
* Do not criticise the alleged perpetrator; the pupil may care about him/her, and reconciliation may be possible.
* Do not ask the pupil to repeat it all for another member of staff. Explain what you have to do next and whom you have to talk to. Reassure the pupil that it will be a senior member of staff.

**Report**

* Share concerns with the designated safeguarding lead (DSL) as soon as possible**.** If you are unable to contact your designated safeguarding lead, deputy designated safeguarding lead, or most senior member of staff, and the child is at risk of immediate harm, contact MASH ([**link**](https://eservices.solihull.gov.uk/ChildrensSocialWorkServiceReferral/) to MASH referral form) contact details on section responsibilities.
* If you are dissatisfied with the response from the DSL or children’s social work, you should ask for the decision to be reconsidered, giving your reasons for this
* A formal referral or any urgent medical treatment **must not** be delayed by the unavailability of designated staff

**Record**

* If possible make some very brief notes at the time and write them up as soon as possible. Keep your original notes on file.
* Any member of staff receiving a disclosure of abuse from a child or young person, or noticing signs or symptoms of possible abuse in a child or young person, will make a written record within the hour recording the disclosure using the child’s own words, what was said or seen and the location both of the abuse and the disclosure.
* Record the date, time, place, persons present and noticeable non-verbal behaviour, and the words used by the child. If the child uses sexual ‘pet’ words, record the actual words used, rather than translating them into proper words.
* A record of a concern, suspicion or allegation should be made at the time of or as soon as possible after the event. Dates and times of events should be recorded as accurately as possible, together with a note of when the record was made. (**See Appendix A - model pro forma**.)
* Record facts and observable things, rather than your ‘interpretations’ or ‘assumptions’.
* A record should be made of any visible marks, bruising or injuries to a child that give cause for concern. This may be completed on a body map. (See **Appendix A)**. The child should not be examined intimately or pictures taken of any injuries / marks.
* All records must be signed and dated clearly with the name of the signatory clearly printed.
* Children **MUST NOT** be asked to make a written statement themselves or to sign any records.
* All records of a child protection nature (handwritten or typed) are passed to the DSL.

**Remember**

* Support the child: listen, reassure, and be available.
* Complete confidentiality is essential**.** Share your knowledge only with appropriate professional colleagues.
* Try to get some support for yourself if you need it.

**Review**

* Has the action taken provided good outcomes for the child?
* Did the procedure work?
* Were any deficiencies or weaknesses identified in the procedure? Have these been remedied?
* Is further training required?

**Summary of What not to do**

It is important to bear in mind that an allegation of child abuse or neglect may lead to a criminal investigation so it is essential that staff **do not ask a child leading questions** or **attempt to investigate the abuse.**

• **Do not** make assumptions.

**• Do not** make negative comments about the alleged abuser.

• **Do not** make any promises that you cannot keep including keeping the information secret.

* Make sure the pupil knows that the information will be passed on to the child protection officer.

• **Do not share concerns with parents.** If appropriate this will be done by the Safeguarding Lead after a discussion with Children’s Services

**L. What to do if you suspect a child is being abused (Without Disclosure)**

* + Discuss your concerns with the Safeguarding Lead. (Julia Low)
  + Show that you are available and prepared to listen.
  + **Do not share concerns with parents**. This will be done by the Safeguarding Lead after a discussion with Children’s Services if so advised.

**What to do next**

• Make sure the child is safe.

• Make an immediate, careful record of what was said using the child’s words not an **interpretation of them. Record facts not opinions.**

• Make sure you date and sign the notes.

• Immediately, and without delay contact the Safeguarding Lead who will make the appropriate referral to Social Services or another external agency. You always have the right to make a referral yourself (see contacts at the end of this policy).

• In the absence of the Safeguarding Lead (**Julia Low**) inform the Deputy Safeguarding Leads (**Marion Veal/Emma Clyde/Sharon Oakes)** (contact details as above)

• Record in writing the fact that you have reported the situation to the Safeguarding Lead.

**M. Records and information sharing**

Well-kept records are essential to good child protection practice.  Our school is clear about the need to record any concern held about a child or children within our school and when these records should be shared with other agencies.

Where there are concerns about the safety of a child, the sharing of information in a timely and effective manner between organisations can reduce the risk of harm. Whilst the Data Protection Act 2018 places duties on organisations and individuals to process personal information fairly and lawfully, it is not a barrier to sharing information where the failure to do so would result in a child or vulnerable adult being placed at risk of harm. Similarly, human rights concerns, such as respecting the right to a private and family life would not prevent sharing information where there are real safeguarding concerns. Fears about sharing information cannot be allowed to stand in the way of the need to safeguard and promote the welfare of children at risk of abuse or neglect. Generic data flows related to

child protection are recorded, and regularly reviewed; and our online school privacy notices accurately reflect our use of data for child protection purposes.

Any member of staff receiving a disclosure of abuse or noticing signs or indicators of abuse, will record it as soon as possible, noting what was said or seen (if appropriate, using a body map to record), giving the date, time and location.  All records will be dated and signed and will include the action taken. This is then presented to the designated safeguarding lead (or deputy), who will decide on appropriate action and record this accordingly.

Any records related to child protection are kept on an individual child protection file for that child (which is separate to the pupil file). All child protection records are stored securely and confidentially and will be retained for 25 years after the pupil’s date of birth, or until they transfer to another school / educational setting.

In line with statutory guidance, where a pupil transfers from our school to another school / educational setting (including colleges), their child protection records will be forwarded to the new educational setting. These will be marked ‘Confidential’ and for the attention of the receiving school’s designated safeguarding lead, with a return address on the envelope so it can be returned to us if it goes astray. We will obtain evidence that the paperwork has been received by the new school and then destroy any copies held in our school. Where appropriate, the designated safeguarding lead may also make contact with the new educational setting in advance of the child’s move there, to enable planning so appropriate support is in place when the child arrives.

Where a pupil joins our school, we will request child protection records from the previous educational establishment (if none are received).

**Interagency working**

It is the responsibility of the designated safeguarding lead to ensure that the school is represented at, and that a report is submitted to, any child protection conference called for children on the school roll or previously known to them. Where possible and appropriate, any report will be shared in advance with the parent(s) / carer(s). The member of staff attending the meeting will be fully briefed on any issues or concerns the school has and be prepared to contribute to the discussions at the conference.

If a child is subject to a Child Protection or a Child in Need plan, the designated safeguarding lead will ensure the child is monitored regarding their school attendance, emotional well-being, academic progress, welfare and presentation. If the school is part of the core group, the designated safeguarding lead will ensure the school is represented, provides appropriate information and contributes to the plan at these meetings. Any concerns about the Child Protection plan and / or the child’s welfare will be discussed and recorded at the core group meeting, unless to do so would place the child at further risk of significant harm. **In this case the designated safeguarding lead will inform the child’s key worker immediately and then record that they have done so and the actions agreed.**

**N. Confidentiality**

Confidentiality is an issue that needs to be discussed and fully understood by all those working with children, particularly in the context of child protection. As a general rule staff should treat all personal information they acquire or hold in the course of working with children as confidential and take particular care with sensitive information. However, staff **must never guarantee confidentiality to a pupil**, as this may not be in the child’s best interests.

Anyone who receives information in confidence should make sure that there is a clear understanding as to how it may be used or shared. If consent is not given, disclosure can be justified if it is in the public interest or if the proposed disclosure is a proportionate response to the need to protect the child.

**O. Allegations against Members of Staff**

All allegations of abuse made against a member of staff in relation to a student must be brought to the attention of the Head teacher and Designated Lead Safeguarding immediately.

In the event the Headteacher is the subject of the allegation, the DSL should report to the LADO and the Chair of the Advisory Board immediately to establish (as outlined in KCSIE 2019) ‘the nature, content and context of the allegation’ and agree the appropriate course of action. In some cases, allegations may be so serious, they will require immediate intervention by the police and or children’s social care services.

In the event of the allegation being made against a member of staff, the DSL is responsible for reporting it to Bromley Safeguarding Board/ Safeguarding Partners.

If the allegation meets any of the following criteria, the Headteacher (or other lead person) must report it to the Local Authority Designated Officer **the same day**. Please refer to contact details of LADO if it is alleged that a teacher or member of staff (including a volunteer) has:

* 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/she is unsuitable to work with children

For other allegations the Headteacher and DSL will decide if further enquiries are required prior to referral to the Local Authority Designated Officer.

Where the Headteacher considers that a referral may be warranted under Child Protection Procedures when an allegation appears to meet the criteria, the Headteacher must inform the Local Authority's Designated Officer.

The **Local Authority's Designated Officer (LADO)** must be informed of all allegations that come to the Tutorial Foundation’s attention that meet the criteria so that the **LADO** can consult police and social care colleagues as appropriate. The Local Authority Designated Officer should also be informed of any allegations that are made directly to the police or to children's social care. All alleged physical injuries must be investigated by the appropriate external agencies.

* In response to an allegation staff suspension should not be the default option. An individual should only be suspended if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification should be recorded by the school and the individual notified of the reasons.
* Allegations that are found to have been malicious should be removed from personnel records and any that are not substantiated, are unfounded or malicious should not be referred to in employer references.
* For those cases where it is clear immediately that the allegation is unfounded or malicious, then it is expected that they should be resolved within one week. Depending upon the circumstances, it may be necessary to suspend the member of staff on full pay without prejudice, while investigations are carried out.
* The student concerned will receive help and support from relevant staff. The member of staff accused of the allegation will also receive support from a named senior member of staff and the case will be managed in accordance with the framework as set out in Working Together to Safeguard Children (July 2018).
* In line with the guidance of the DFE “Dealing with allegations of abuse” (2012) the quick resolution of any allegation should be a clear priority to the benefit of all concerned. At any stage of consideration or investigation, all unnecessary delays should be eradicated.

**P. Disciplinary, Grievance Procedures**

Where a safeguarding concern or allegation triggers another procedure such as grievance or disciplinary, that procedure shall only be followed once the immediate safeguarding concern or allegation has been fully investigated.

**Parents and pupils**

If a parent or pupil has a safeguarding concern, question, doubt or allegation about the conduct of an adult, s/he should raise it with the DSL or Deputy DSL/Headteacher. If a parent or pupil raises their concern with another member of staff, it will be immediately passed onto the DSL in accordance with this policy, who will then make immediate contact with the LADO.

**Transparency and Working with Parents**

The School prides itself on its respect and mutual tolerance. Parents/guardians have an important role in supporting the school. Copies of this policy, together with our other policies relating to issues of child protection are available from the School office and the website. We hope that parents and Guardians will always feel able to take up any issues or worries that they may have with the school.

**We will never ignore an allegation of child abuse and make immediate contact with the LADO.**

**Complaints**

If a parent considers that the School has not operated the Child Protection and Safeguarding Policy correctly, they may submit a complaint under the Complaints Policy which is on the School website or available free on request from the School Office. If a

member of staff has a concern about the School’s child protection and **safeguarding practice and procedures then they should follow the Whistleblowing Policy.**

**Q. Whistleblowing**

All members of staff and the wider school community should be able to raise concerns about poor or unsafe practice and feel confident any concern will be taken seriously by the school leadership team. We have ‘whistleblowing’ procedures in place and these are available in the school Whistleblowing Policy. However, for any member of staff who feels unable to raise concerns internally, or where they feel their concerns have not been addressed, they may contact the [NSPCC whistleblowing helpline](https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/) on: 0800 028 0285 (line is available from 8:00 AM to 8:00 PM, Monday to Friday) or by email at: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

Parents or others in the wider school community with concerns can contact the NSPCC general helpline on: 0808 800 5000 (24 hour helpline) or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk) .

**R. Miscellaneous**

**Admissions and Attendance**

All parents applying for places at the School will be informed of our safeguarding responsibilities and the existence of this policy.

The School will require documentary proof as to the identity of pupils presented for admission. If there is any doubt as to the identity of a pupil, advice will be sought from the local authority and other statutory agencies, as appropriate.

Any pupil whose attendance falls below 80% during the course of a full school term may be referred to Bromley’s Early Help Service or the relevant Local Authority equivalent, and vigilance is applied mindful of the risks for pupils associated with going missing from education.

**Staff Code of Conduct**

The School has a Staff Code of Conduct as a separate policy. The purpose of this Code of Conduct is to provide clear direction to staff about expected codes of behaviour in working with the young people entrusted to their care. The policy is designed to ensure staff are fully aware of what is required in terms of upholding appropriate relationships with pupils, both for their protection as well as that of their pupils. It also includes guidance on whistleblowing procedures. This policy may be requested from the School Office.

**Health and Welfare**

All members of staff have a duty to safeguard our pupils' welfare and must therefore familiarise themselves and comply at all times with the School child Protection and Safeguarding Policy. This includes a duty both to children in need and to children at risk of harm. **All staff have read Part 1 of KCSIE September 2019, and Annex A. We also recommend to read Annex B.**  Safeguarding children and child protection issues are on

the agenda of regular staff meetings and discussions where by the school draws on the expertise of staff to help shape safeguarding arrangements and policies. All School staff should be aware that safeguarding incidents can happen at any time and anywhere and are required to be alert to any possible concerns.

**Use of reasonable force**

The term ‘reasonable force’ covers a broad range of actions used by staff that involve a degree of physical contact to control or restrain children. There are circumstances when it is appropriate for staff to use reasonable force to safeguard children and young people, such as guiding a child to safety or breaking up a fight. ‘Reasonable’ means using no more force than is needed. Our school works in accordance with statutory and local guidance on the use of reasonable force and recognises that where intervention is required, it should always be considered in a safeguarding context.

**Visiting Speakers**

Where visiting speakers are invited to the School by staff, the staff in charge of the event will carry out informal checks on their suitability, including their appropriateness in terms of risk of radicalisation. Reasonable background information is obtained in advance to decide whether to invite and/or permit a speaker to attend the School. Informal checks may include, for example, checking their website, reviewing the nature of materials used by the speakers or suitability.

Speakers and visiting professionals are asked for official photo identification on arrival, issued with a visitor badge and supervised by a vetted member of staff whilst on site.

In fulfilling its Prevent Duty obligations the School does not discriminate on the grounds of race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age. **See also Appendix B – Visiting Speaker Checklist**

**Success Criteria- Monitoring**

The DSL OR DSLS will monitor the operation of the Child Protection and Safeguarding Policy and make an annual report on child protection and safeguarding practice to all members of the Advisory Board. **This process of annual review will ensure that the school’s policy and procedures are in accordance with statutory and local authority guidance.**

|  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Policy Sign off and review**   |  |  |  | | --- | --- | --- | |  | **By whom** | **Date** | | **Policy signed off by** | Julia Low and the Chair of the Advisory Board | 1.10.2019 | | **Reviewed by** | Julia Low and Members of the Advisory Board | 1.10.2019 | | **Next Review By** | Julia Low and Members of the Advisory Board | 31.10.2020 | |

|  |
| --- |
| **This Policy must be read in conjunction with:**  Child protection and safeguarding approach is included in all of the following policies   * Behaviour Management & Anti-bullying * Complaints * Confidentiality * Data Protection * Equality & Diversity * E-Safety (Internet Usage; e-mail; Digital video & images; Handheld Devices & Mobile phones) * First Aid Policy * Health and Safety Policy * Induction * Off-Site Safeguarding * PSHE & Citizenship * Pupil Attendance * Recruitment & Selection * Whistleblowing Policy * Fire Policy * Staff Code of conduct * Behaviour Policy   [Description: http://www.thetutorialfoundation.co.uk/wp-content/uploads/2012/05/1332262392_Download_Blue.png](http://www.thetutorialfoundation.co.uk/wp-content/uploads/2012/07/Prospectus.pdf)  **APPENDIX A** |
|  |

**Safeguarding/Cause for Concern Record Sheet**

|  |  |
| --- | --- |
| Pupil - Name |  |
| Tutor Group |  |
| When did the child speak to you?  Time, Date & Location |  |
| What did the young person say ? |  |
| What did you do or say? |  |
| What else do you know about the young person? |  |
| What action have you taken/are taking as a result of your conversation with this person? |  |
| When this record sheet was completed?  Signed (staff name) Date: |  |

[](http://www.thetutorialfoundation.co.uk/wp-content/uploads/2012/07/Prospectus.pdf)

**APPENDIX B**

**VISITING SPEAKER CHECKLIST**

|  |  |
| --- | --- |
| Name of Speaker: |  |
| Topic: |  |
| Date of visit: |  |
| 1. Research Speaker to ensure they are suitable for the audience /Risk assessment ( possible) |  |
| 2. Agree clear content guidelines with speaker |  |
| 3. Arrange for speaker to be met on arrival and returned to reception for departure |  |
| 4. Arrange for appropriate supervision for speaker whilst in school |  |
| 5. Be prepared to interrupt speaker if they deviate from content and/or the content is a cause for concern (and students who ask leading/inappropriate questions |  |
| 6. If applicable arrange for invoices/expenses to be passed onto the bursary |  |
| Date and Sign |  |

[](http://www.thetutorialfoundation.co.uk/wp-content/uploads/2012/07/Prospectus.pdf)

**APPENDIX C**

**APPENDIX C**

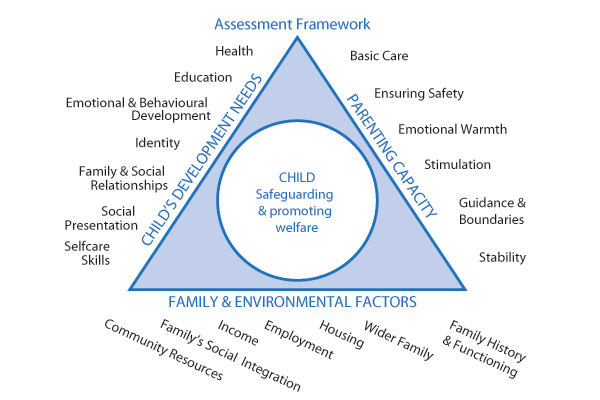
The National Assessment Framework Triangle (Single assessment Framework (SAF) 2015)

The revised ‘Working Together’2018 guidance is clear that a good assessment of the pupil’s welfare

is one that investigates the following three fields, set out in the diagram below:

This framework is used as a tool to give background information about the pupil’s welfare

and assess the needs of families for early help.



[](http://www.thetutorialfoundation.co.uk/wp-content/uploads/2012/07/Prospectus.pdf)

**APPENDIX D**

**DECLARATION FOR STAFF**

**Child Protection Policy and Keeping Children Safe in Education (DfE 2019)**

I have read and I am familiar with the contents of the following documents and understand my role and responsibilities as set out in these documents.

(1) The School’s Safeguarding/ Child Protection Policy

(2) **Part 1 and Annex A** and **Annex B** ‘Keeping **Children Safe in Education'** DfE Guidance, 2019

**I have also read all related policies to the Safeguarding/ Child Protection Policy**

I am aware that the DSLs are:

Julia Low – Headteacher and Designated Safeguarding Lead

Marion Veal – Deputy Designated Safeguarding Lead

Emma Clyde – Deputy Designated Safeguarding Lead

Sharon Oakes - Deputy Designated Safeguarding Lead

Lily Truong - Deputy Designated Safeguarding Lead

and I able to discuss any concerns that I may have with them.

I know that further guidance, together with copies of the policies mentioned above, are available in the staffroom.

Signed\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

[](http://www.thetutorialfoundation.co.uk/wp-content/uploads/2012/07/Prospectus.pdf)

**APPENDIX E**

**The Channel process (to PREVENT radicalisation)**

The Channel process is part of the government’s overall strategy of preventing radicalisation, and sets out a framework within which it agencies work together to

1. Identify individuals at risk of being drawn into terrorism
2. Assess the nature and extent of that risk
3. Develop the most appropriate support plan for the individuals concerned

Safeguarding pupils from radicalisation is no different from safeguarding them from other forms of harm. Indicators for vulnerability to radicalisation overlap with those, which underlie other vulnerabilities that might give rise to safeguarding concerns, including

1. Family tensions
2. Sense of isolation
3. Distance from cultural heritage
4. Experience of racism or discrimination either personally or as a witness to the event
5. Feeling of failure

Channel assesses vulnerability using a consistently applied vulnerability assessment framework built around 3 criteria. The 3 criteria are

1. Engagement with a group, cause or ideology
2. Intent to cause harm
3. Capability to cause harm

The examples below are useful to highlight possible indicators of risk of intent or capability to cause harm or that an individual is engaged with an extremist group, cause or ideology include:

1. Spending increasing time in the company of other suspected extremists
2. Changing their style of dress or personal appearance to accord with the group
3. Day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause
4. Loss of interest in other friends and activities not associated with the extremist ideology, group or cause
5. Possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups)
6. Attempts to recruit others to the group/cause/ideology
7. Communications with others that suggest identification with a group/cause/ideology

Example indicators that an individual has an intention to cause harm, use violence or other illegal means include

1. Clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills
2. Using insulting or derogatory names or labels for another group
3. Speaking about the imminence of harm from the other group and the importance of action now
4. Expressing attitudes that justify offending on behalf of the group, cause or ideology
5. Condoning or supporting violence or harm towards others
6. Plotting or conspiring with others

Example indicators that an individual is capable of causing harm or contributing directly or indirectly to an act of terrorism include

1. Having a history of violence
2. Being criminally versatile and using criminal networks to support extremist goals
3. Having occupational skills that can enable acts of terrorism (such as civil engineering, pharmacology or construction)
4. Having technical expertise that can be deployed (e.g. IT skills, knowledge of chemicals, military training or survival skills)

The examples above are not exhaustive and vulnerability may manifest itself in other ways. There is no single route to terrorism nor is there a simple profile of those who become involved. For this reason, any attempt to derive a ‘profile’ can be misleading. It must not be assumed that these characteristics and experiences will necessarily lead to individuals becoming terrorists, or that these indicators are the only source of information required to make an appropriate assessment about vulnerability. Outward expression of faith, in the absence of any other indicator of vulnerability, is not a reason to make a referral to Channel.

The Channel referral process requires that concerns should be passed on to the DSL/DSLS, who may consult with the local Prevent Officer (Police/Local Authority). If further action is considered appropriate, screening by the police Channel Coordinator might take place, followed by a preliminary assessment by the Local Authority’s Prevent Lead and Police Channel Coordinator.

Again, if further action is considered necessary, the next step might be the creation of an assessment and action plan by the local Multi-Agency Channel Panel, and subsequent implementation of that plan, which would be aimed at re-engaging the individual and preventing radicalisation. The framework for referral, review and action is not intended to criminalise individuals, but to set a course to avoid precisely that.