**Child Protection and Safeguarding Policy**

**Child Protection is always a top priority at Papplewick.**

We at Papplewick recognise that it is our objective and our duty to safeguard from harm, and actively to promote the welfare of, each individual child.

The focus of our policies is upon positive welfare outcomes for our children and upon reducing any risks to both boarders and dayboys while they are at school.

We ensure that we create an atmosphere in the school where all children feel secure and valued. This is our primary aim. All welfare provision is directed towards this goal, whether the provision is a matter of people, premises, policies or practices.

Our policies and practices follow the Education Act 2002 Section 175 (Regular Compliance – ISSRs and National Minimum Standards for Boarding) and take into account the Berkshire Local Safeguarding Children Board’s Child Protection Procedures, which may be viewed at <http://proceduresonline.com/berks/>.

They also have regard to the Children Act 1989, ‘Prevent Duty’ under Section 26 of the Counter-Terrorism and Security Act 2015, and to the documents *Keeping Children Safe in Education* (DfE, August 2018) and *Working Together to Safeguard Children* (DfE August 2018). All staff receive a copy of Part One of *Keeping Children Safe in Education* (DfE, September 2018), the School’s Safeguarding Policy, Behaviour Policy and the Staff Code of Conduct (which also forms part of this safeguarding policy and a copy of which may be obtained from the School Office), and must sign a document stating that they have read and understood the contents. All staff who are directly engaged in working with children are required to read at least Part One and Annex A of *Keeping Children Safe in Education* (DfE, September 2018), and understand the documentation in relation to the School. All staff are made aware of the process for making referrals to children’s social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments. Please see job description for the Designated Safeguarding Lead (DSL) at Appendix A.

We recognise that all members of staff have a full and active part to play in protecting our pupils from harm, and that the child’s welfare is of paramount concern. It is important for staff always to speak to the Designated Safeguarding Lead (and any Deputies) who is most likely to have a complete safeguarding picture.

The School prohibits the use of corporal punishment.

Details of key contacts:

|  |  |  |
| --- | --- | --- |
| **Title** | **Name** | **Contact details** |
| Designated Safeguarding Lead\*Prevent Safeguarding Lead Deputy Headmaster | Mark Burley | burlemar@papplewick.org.ukTel: 07970-752060 |
| Deputy Designated Safeguarding LeadDeputy Prevent Safeguarding Lead. Director of Pastoral Support | Lucy Williams. | lucywilliams@papplewick.org.ukTel: 07899-793022 |
| Headmaster | Tom Bunbury | hm@papplewick.org.ukTel: 07795-096117 |
| Multi Agency Safeguarding Hub (MASH) is (Duty Social Workers and LADO)  |  | Tel: 01628-683150Email: MASH@rbwm.gov.ukor if out of hours 01344-786543 (Emergency Duty Team) |
| Prevent Governor/Governor responsible for Safeguarding | Andrew McGregor | Email via the School Secretary at schoolsec@papplewick.org.uk Tel: via the school at 01344 621488 |
| Local Authority Designated Officer | Sharon Richards | Windsor and Maidenhead Town Hall Tel: 01628 796693 |
| School Doctor | Dr. Patel | Tel: 01344 637800 |
| Childline |  | Tel: 0800 1111 |
| Ofsted |  | Tel: 08456 404040 |
| The Office of the Children’s Commissioner |  | Tel: 0800 528 0731 |
| NSPCC |  | Tel: 0808 800 5000 |

\*The Designated Safeguarding Lead has the status and authority to take responsibility for child protection and safeguarding matters within Papplewick and liaise with external agencies.

The Governing Body as a whole recognises that it is their objective and their duty to safeguard from harm, and actively to promote the welfare of, each individual child at Papplewick. The School’s Child Protection and Safeguarding Policy will be reviewed once a year by the Governing Body, including a review of the efficiency with which the related duties have been discharged.

This policy was last reviewed by the Governing Body in June 2018 and will next be reviewed in June 2019.

**The following documents are divided into policies and guidance:**

Within this document members of staff should be aware that the use of ‘must’ and ‘should’ has been clarified to explain that ‘must’ is used when a person is legally required to do something and ‘should’ is used when the advice should be followed unless there is a good reason not to.

1. Anti-Abuse Statement

2. Categories and indicators of abuse & neglect

3. Staff Guide for Child Protection

4. Countering Abuse

5. Guidance to Staff on prudent conduct to avoid allegations of abuse

6. Training

7. Recruitment Checks

8. Dealing with Allegations of abuse against staff

9. Suspension of Staff

10. Abuse of a pupil by another pupil / Sexting

11. Link to Disclosure and Barring Service

12. Links to Teaching Regulation Agency

13. Deficiencies or Weaknesses

14. Availability of Policy

15. Abuse of trust

16. Responsibility for Papplewick pupils by another organisation

17. Missing in Education

18. Missing Pupil Policy

19. Visiting Speakers

20. School Whistleblowing Policy

21. Staff Professional Code of Conduct

22. Other Links

23. Child on child sexual violence and sexual harassment

24. Criminal Exploitation – County Lines

25. Domestic Abuse

26. Children and the Court System and Children with family members in prison

27. Homelessness

28. Homestays

29. Links to Children and Social Work Act 2017

30. Monitoring and Evaluation of this policy (just re-ordered to come at the end)

**1. Anti Abuse Statement**

We understand that abusive behaviour may occur between children (peer-on-peer) and also between adults and children. These incidents may be of a physical, emotional, or sexual nature, or be through neglect.

At Papplewick:

1. We are against all kinds of physical abuse and aggressive behaviour (see the Anti Bullying Statement) and we condemn violence in all its forms. We seek to protect all boys from any accident, unnecessary injury or mishap that would cause them harm.
2. We realise that emotional abuse can take place where persistent emotional ill treatment of a child adversely affects his emotional development by lowering his self-esteem. In a complex relationship, there is often an element of control or power where a person who is physically or emotionally stronger, or who is more intelligent, abuses another who may be physically weaker, emotionally fragile who is less quick-witted or receives special educational needs support (SEN). This behaviour is likely to be repeated over time. The lowering of self-esteem and emotional abuse can also be caused by parental neglect or feelings of being unwanted by family members. The emotional consequences of divorce have the potential to be deep and long lasting in a child of prep school age. We will act in a way to help counter and eradicate all forms of emotional abuse.
3. We conclude that it is often difficult to discern the moment when what is normal sexual behaviour in pre-teenage boys begins to become sexually abusive. We recognise that where there is a power relationship (in which intimidation is used) or where there is a relationship between boys from different age groups with a high degree of secrecy, then there may be sexual abuse.
4. We understand that ensuring that boys are protected from radicalisation and extremism is a safeguarding issue.
5. We understand that children going missing in education may be a safeguarding issue.
6. We recognise that any child may benefit from early help and are particularly alert to the potential need for early help for a 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 into 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 misusing drugs or alcohol themselves; or
* is at risk of modern slavery, trafficking, or exploitation.

Papplewick School and its staff form part of a wider safeguarding system for children (as described in the statutory guidance *Working together to Safeguard Children* (DfE, August 2018. Safeguarding and promoting the welfare of children is **everyone’s** responsibility. **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 members of staff must ensure that, at all times, they consider what is in the best interests of the children.

Every person who comes into contact with a child has a role to play in identifying concerns, sharing information and taking prompt action. There is no place for abuse of any kind in our community and we will do all in our power to prevent any incidents of physical, emotional or sexual abuse at our school.

**Contextual Safeguarding**: we are aware that safeguarding incidents and/or behaviours can be associated with external factors and/or can occur between children outside the School. All members of staff, but especially the Designated Safeguarding Lead (or Deputy), should consider the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child’s life that are a threat to their safety and/or welfare. Children’s social care assessments should consider such factors so it is important that schools and colleges provide as much information as possible as

part of the referral process. This will allow any assessment to consider all the available

evidence and the full context of any abuse.

**2. Categories and indicators of abuse & neglect**

**(i) Physical Abuse**

**Physical abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.

It may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.

**The following may be indicators of concern:**

* An explanation which is inconsistent with an injury
* Several different explanations provided for an injury
* Unexplained delay in seeking treatment
* Parents/carers are uninterested or undisturbed by an accident or injury
* Parents are absent without good reason when their child is presented for treatment
* Repeated presentation of minor injuries (which may represent a ‘cry for help’ and if ignored could lead to a more serious injury) or may represent fabricated or induced illness.
* Repeated use of different doctors, A&E departments and other forms of direct health provision
* Reluctance to give information or mention previous injuries
* Injuries can include bruising, bite marks, burns and scalds, fractures and scars

**(ii) Emotional Abuse**

**Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and persistent 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 he meets 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 (e.g. interactions beyond the child’s developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participation in normal social interaction.

It may involve seeing or hearing the ill-treatment of another.

It may involve serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation and corruption of a child.

Some level of emotional abuse is involved in most types of ill treatment of children, though emotional abuse may occur alone.

**Recognition of emotional abuse is usually based on observations over time and the following offer some associated indicators:**

Parent/carer and child relationship factors

* Abnormal attachment between a child and parent/carer e.g. anxious, insecure or avoidant, indiscriminate or no attachment
* Indiscriminate attachment or failure to attach
* Conveying to children they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person e.g. persistent negative comments about the child or ‘scapegoating’ within the family
* Developmentally inappropriate or inconsistent expectations of the child which is outside what is considered reasonable and acceptable cultural/legal norms e.g. over-protection, limited exploration and learning, interactions beyond the child’s developmental capability, prevention of normal social interaction
* Causing children to feel frightened or in danger e.g. witnessing domestic violence, seeing or hearing the ill treatment of another

Child Presentation concerns

* Behavioural problems e.g. aggression, attention seeking, hyperactivity, poor attention
* Frozen watchfulness, particularly in pre-school children
* Low self-esteem, lack of confidence, fearful, distressed, anxious
* Poor peer relationships including withdrawn or isolated behaviour

Parent/carer related issues

* Dysfunctional family relationships including domestic violence
* Parental problems that may lead to lack of awareness of child’s needs e.g. mental illness, substance misuse, learning difficulties
* Parent or carer emotionally of psychologically distant from child

**(iii) Sexual Abuse and Violence**

**Sexual abuse and violence** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.

Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

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

Children under 16 years of age cannot lawfully consent to any sexual activity occurring, although in practice young people may be involved in sexual contact to which, as individuals, they may have agreed.

**Behavioural indicators of sexual abuse and violence may include:**

* Inappropriate sexualised conduct
* Sexually explicit behaviour, play or conversation, inappropriate to the child’s age
* Continual and inappropriate or excessive masturbation
* Self-harm (including eating disorder), self-mutilation and suicide attempts
* An anxious unwillingness to remove clothes for sports events (but this may be related to cultural norms or physical difficulties)
* Running away

**(iv) Neglect**

**Neglect** involves 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 and development.

Neglect may occur during pregnancy, for example, 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 or shelter (including exclusion from home or abandonment);
* Protect 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.

**Child related indicators include**:

* Non-organic failure to thrive/faltering growth
* Delay in achieving developmental, cognitive and/or other educational milestones
* A child who is unkempt or inadequately clothed or dirty or smells
* A child who is perceived to be hungry frequently
* Behavioural signs may include a child seen to be listless apathetic and unresponsive with no apparent medical cause, anxious attachment; aggression; indiscriminate friendliness
* Failure of child to grow or develop within normal expected pattern, with accompanying weight loss or speech/language delay
* Recurrent/untreated infections of skin conditions e.g. eczema or persistent head lice/scabies
* Unmanaged/untreated health/medical conditions including poor dental health
* Frequent accidents or injuries
* Child frequently absent or late at school
* Poor self esteem
* Child thrives away from home environment

**Indicators in the care provided:**

* Failure by parents or carers to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene
* Failure by parents or carers to meet the child’s health and medical needs e.g. poor dental health; failure to attend or keep appointments with health visitor, GP or hospital; lack of GP registration; failure to seek or comply with appropriate medical treatment; failure to address parental substance misuse during pregnancy
* A dangerous or hazardous home environment including failure to use home safety equipment; risk from animals
* Poor state of home environment e.g. unhygienic facilities, lack of appropriate sleeping arrangements, inadequate ventilation (including passive smoking) and lack of adequate heating
* Lack of opportunities for child to play and learn
* Child left with adults who are intoxicated or violent
* Child abandoned or left alone for excessive periods

**(v) Cyber-bullying**

* Where there is reasonable cause to believe that a boy is suffering or is likely to suffer significant harm, a bullying issue must be treated as a child protection issue and the school safeguarding procedures must then be followed. This includes cyber-bullying, and ‘sexting’ (also known as youth produced sexual imagery) and ‘banter’. (See cyber-bullying section of Anti-bullying Policy)

**Guidance for Staff re cyber-bullying**

* We aim to teach safe internet practice and etiquette. All boys and staff must sign the School’s acceptable use policies.
* We apply the school policy on electronically generated images.
* We give guidance on personal privacy, on material posted on any electronic platform and on photographic images.
* We collect in all mobile phones at bedtime. Mobiles are only to be used during their free time during the designated dormitory hours. Mobiles are not allowed downstairs except when going on half term/exeats.
* Personal laptops are fitted with our security software.
* We aim to educate parents as well as the boys on matters of e-safety through lectures, guidance bulletins from the School etc.)
* We aim to increase our knowledge of the boys’ use of technology through the use of annual surveys.
* Should any equipment belonging to a boy be misused, the equipment should be confiscated immediately. If a boy is misusing a school computer, he should be removed from the computer immediately. He will have his access limited or stopped for a time.
* The member of staff must report any instance of cyber-bullying to the Deputy Headmaster, to whom any equipment should be given. He will liaise with the Head of ICT on technical issues and then liaise with the Headmaster.

**Guidance to be given to boys re cyber-bullying**

If you are being subjected to cyber-bullying:

* Always tell someone you can trust.
* Don’t reply to the message; keep it, don’t delete it.
* Make sure only your family and good friends have your mobile number.
* Never reply to someone on email, whom you do not know.
* Never give out your personal details to someone that you don’t know.
* Never embarrass or harass a person by forwarding or sending texts or images of that person to others.
* Never spread other boys’ phone numbers or computer passwords.
* Never give out your passwords to your mobile or email accounts.
* Don’t lend your phone to anyone.
* Do not have ‘friends’ online that you have not met in the ‘real world’.

**3. Staff Guide for Child Protection**

* Be aware that allegations could be made against members of staff (including the Headmaster), volunteers or pupils. Please see the School’s Whistleblowing Policy (which also forms part of this Policy) but there is an obligation on staff to report immediately to the Designated Safeguarding Lead, Children’s Services, or Ofsted (08456 404040) any safeguarding concern or allegation about the School’s practices or the behaviour of colleagues, which are likely to put the pupils at risk of abuse or other serious harm. **Note that any member of staff can make a referral directly to Children’s Services.** Immunity will be provided from retribution or disciplinary action for such staff whistleblowing in good faith.
* Staff must follow exactly the same procedures for reporting Prevent concerns as in the paragraph above. In addition, staff may also contact the local Prevent Officers within Thames Valley Police at prevent@thamesvalley.pnn.police.uk, or the Department for Education may be contacted on their helpline on 0207-340-7264 to enable members of staff to raise concerns relating to extremism directly or, if not an emergency, by email to counter-extremism@education.gsi.gov.uk
* Should a pupil’s welfare not be improving, the staff member with concerns should press for re-consideration or make the referral directly themselves.
* Members of staff should also be aware that allegations could be made by one or more pupils against another.
* If a member of staff has safeguarding concerns or an allegation about the Headmaster, he or she will inform the Chairman of Governors without informing the Headmaster first and/or the Local Authority Designated Officer directly. In the case of serious harm, the police must be informed from the outset.
* In the event of an allegation, whether by an adult or by a pupil, immediately inform **the** **Designated Safeguarding Lead, Mark Burley, of the matter.** He is under an obligation to notify Children’s Services of an allegation of abuse within twenty-four hours of a disclosure or suspicion of abuse. **The contact details for the Multi Agency Safeguarding Hub (MASH) the Duty Social Workers and LADO are above.** If the Designated Safeguarding Lead is absent, please inform the Deputy Designated Safeguarding Lead, Lucy Williams, or in her absence as well, please inform the Headmaster. You may of course inform Children’s Services directly yourself on the numbers above, and, i**f a child is in immediate danger, call the Police on 999.**
* The School and DSL should maintain links with relevant agencies when children and families are seeking support and help under the Multi-Agency Team (MAT) arrangements or under Children in Need planning. When planning, the DSL should reflect upon local procedures and protocols in conjunction with the MATs overarching child protection policy.
* The Designated Safeguarding Lead must follow the advice given by Children’s Services, LADO, and/or Police (including the Channel process in the event of case involving Prevent) and such advice must be recorded. Collaboration with all key agencies by the Designated Safeguarding Lead is of the utmost importance from first contact being made. Such collaboration may lead to any number of outcomes including a Strategy Discussion, a Child Protection Conference, or the use of the ‘Common Assessment Framework’ or ‘Team around the Child’.
* The Designated Safeguarding Lead must inform the local authority of any pupil who fails to attend school regularly, or has been absent without the School’s permission for a continuous period of 10 school days or more, at such intervals as are agreed between the School and the local authority.
* The Designated Safeguarding Lead should inform parents that a referral is being made unless advised not to by Social Services. Consent is certainly not required where there are reasonable grounds to believe that a child is at risk of significant harm. In addition, the parent with parental responsibility should always be informed by the Designated Safeguarding Lead, if an allegation is made against the other parent unless advised not to do so by Children’s Services.
* All notes regarding a safeguarding or child protection matter will be kept on a separate file by the Designated Safeguarding Lead. Each file is then stored in a separate locked filing cabinet in the Headmaster’s office. Any notes held on computers will be password protected.

**4. Countering Abuse**

* As promoters of boys’ physical, emotional and spiritual welfare, we must meet the individual needs of each boy.
* We must recognise the potential for ‘grooming’ activity through the Internet or through ‘gaming’ activity.
* We must aim to be part of our listening culture where all boys’ views and concerns are heard.
* We must help boys to see that it is okay to talk and challenge the ‘macho’ stereotype (where suffering in silence is the only ‘manly’ way to behave) so that boys learn to express feelings and aspirations. They must know that they can talk to anyone, anytime.
* We must lead by example.
* We must use common sense.
* We must be fair.

Response to a possible child protection incident

* Do not rush in.
* Listen to both/all sides of those who saw what happened.
* Try to unravel the sequence of events but do not ask leading questions. Not ‘did he hit you on the arm?’ but ‘what did he do next?’
* Be aware of the possibility of ‘reverse bullying’ where younger boys have ganged up on an older boy to wind him up.
* Don’t spring into action; listen and take time.
* Check that you asked all the witnesses for their view.
* Reflect before acting; don’t shoot from the hip.
* Make notes.

Professional guidelines:

Avoid the following at all times:

* Corporal punishment (see Use of Reasonable Force Policy including an understanding that there is an additional vulnerability for the child when incidents involve children with SEN or disabilities or with medical conditions);
* Punishments outside the School’s disciplinary system (e.g. deprivation of food);
* Ridicule, humiliation;
* Favouritism; or
* Inviting individual boys into a staff room or flat.

Respect privacy and private space, particularly in the lavatories, changing room, showers, dormitories and common rooms during free time. Supervise; don’t watch.

Remember that upstairs in dorms is home, so be more relaxed, but respect personal space. Do not go into dorms after lights have been turned off. Ask a Matron. If you need to enter a dorm after lights-out for disciplinary or any other reason, switch on the lights as you enter.

GAP students should not meet with pupils in their private rooms under any circumstances.

During periods of evening duty, senior members of staff can be located as follows:

Jon Nutter (Junior Houseparent) in his flat in the main building; Laetitia Langue (Year 7 Houseparent) in her flat in the main building; Mark Burley (Deputy Headmaster) in the Bungalow; Scott and Katherine Smith-Bannister (Year 8 Houseparents) in their flat in the Year 8 boarding house; Tom Bunbury (Headmaster) in New Lodge.

When on duty, remember to monitor boys’ common rooms regularly. Include the squash courts on your circuit as well as the changing rooms and dormitories in free time and do go round the school boundaries where the ‘dens’ are in Spring and Summer Term. This in addition to the normal areas (e.g. Sports Hall gallery, games room, stage, music school practice rooms, and the computer rooms).

Particular times to be watchful: between lessons (particularly if a class is waiting outside a teaching room for a lesson to finish), during reading after lunch, and in the queue before lunch and tea. Although the changing room is supervised before and after games, members of staff must be mindful of its attraction as a games centre in free time.

**5. Guidance to Staff on prudent conduct to avoid allegations of abuse**

* If speaking to an individual pupil in a room, staff should either leave a door open or position themselves so that they can be seen through either a window or glass in the door.
* Staff should not meet individual pupils in private accommodation under any circumstances with the exception of female Houseparents or Assistant Houseparents for compassionate reasons when a boy is distressed.
* The School Nurse may see a boy on his own for medical reasons.
* Staff may meet two or more boys in private accommodation but this should be restricted to social ‘treats’ such as ‘tutor’s feasts’ or ‘Nutter, or Toastie nights’.
* Staff should not communicate with pupils on a private or social basis either by e-mail or through social networking sites. The communication of purely academic work by e-mail is acceptable.
* Staff should not convey an individual pupil by car for any reason other than a medical appointment, medical emergency, taking a boy to the airport or on a school visit. If conveyed in this manner, staff must record the journey and names of pupils in the relevant file in the staffroom. Female Houseparents or Assistant Houseparents may convey an individual boy in order to purchase uniform, shoes or to have a haircut.
* Staff should be aware that any form of physical contact with a pupil has the potential to be misconstrued and could result in an allegation. However, when looking after pupils in the 6 to 13 age range, it is recognised that there can be occasions when physical contact is appropriate in exercising compassionate pastoral care. Where such contact is appropriate (for instance, when a boy is injured or in considerable distress), staff should ensure that they are clearly visible to other adults or boys to avoid any possibility of their actions being misconstrued.

**6. Training**

* The Designated Safeguarding Lead and Deputy DSLs will receive training in child protection and inter-agency working, which must be updated every two years.
* All staff will receive appropriate training in safeguarding and child protection. Temporary and voluntary staff who work with children will be made aware of the School’s child protection and safeguarding arrangements. Members of 'staff receive safeguarding and child protection updates (for example, via email, bulletins and staff meetings), as required and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively’.
* The Prevent Governor, Prevent Safeguarding Lead, and Deputy Prevent Safeguarding Leads are required to complete the Educare Prevent Training Module.
* All members of staff are required to complete a Prevent/Channel Awareness on-line course at <http://course.ncalt.com/Channel_General_Awareness/01/index.html>
* Induction training will be provided for all members of staff (including ancillary staff and volunteers newly appointed)
* All staff are required to read at least Part One and Annex A of *Keeping Children Safe in Education* (DfE, September 2018), and understand the documentation in relation to the School.
* All members of staff are issued with credit card sized key points for safeguarding and child protection.
* Senior boys with positions of responsibility are briefed over appropriate action to take should they receive an allegation of abuse, or have concerns.
* Relevant staff are trained in safer recruitment processes.

**7. Recruitment Checks**

All members of staff, who are appointed to a position in the School, are subject to recruitment checks in line with DCSF Standard 4 and National Minimum Boarding Standard 14, and Governors to DCSF Standard 4B.

When appointing new staff and volunteers, the School will:

* verify a candidate’s identity from current photographic ID and proof of address;
* obtain a certificate for an enhanced DBS check with a barred list information where the person will be engaging in regulated activity;
* obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available and provide in writing risk assessed arrangements with the individual subject to fortnightly reviews;
* obtain two satisfactory references for the member of staff;
* check that a candidate to be employed as a teacher is not subject to a prohibition order issued by the Secretary of State, using the Employer Access Online service;
* check that a candidate to be employed in a relevant position is not subject to a prohibition from management order;
* verify the candidate’s mental and physical fitness to carry out their work responsibilities;
* verify the person’s right to work in the UK;
* ensure they sign the school ‘Disqualification Declaration’ under the Disqualification under the Childcare Act 2006 (by association);
* if the person has lived or worked outside the UK, make any further checks the School considers appropriate and verify professional qualifications, as appropriate;
* if the person is to carry out ‘teaching work’ and is from a country within the European Economic Area, checks will be made through the NCTL Teacher Services system as to whether sanctions or restrictions have been imposed by another EEA professional regulating authority for teachers;
* require successful applicants to sign a declaration that they have received, read, and understood in the context of the school Part One of Keeping Children Safe in Education (September 2018) and Annex A, the School’s Safeguarding Policy, the Behaviour Policy, the safeguarding response to children who go missing in education, and the Staff Code of Conduct. The Safeguarding Governor visits the school to carry out spot-checks on staff regarding their understanding.
* Staff files have a checklist inside the left-hand cover to assist with ensuring all relevant checks are completed before commencing work at the School.
* Staff induction will also include gaining an understanding of the role of the Designated Safeguarding Lead (including the identity of the DSL and any deputies).

**8. Dealing with Allegations of abuse against staff**

* + - Procedures need to be applied with common sense and judgement and have regard to the guidance in *Keeping Children Safe in Education* (DfE, September 2018).
		- The LADO must be contacted by the School, and the School must not undertake its own investigations without prior consultation with the LADO.
		- Allegations found to be malicious will be removed from personnel records.
		- Records will be kept of all other allegations but any that are false, unsubstantiated, unfounded or malicious will not be referred to in employer references.

**9. Suspension of Staff**

Suspension should not be an automatic response to an allegation. It should only be considered if there is cause to suspect a child or other children at the school to be at risk of significant harm, or if the allegation warrants investigation by the police, or if the allegation is so serious that it might be grounds for dismissal. Due weight should be given to the views of the LADO when considering suspending a member of staff. Where a member of staff is suspended pending an investigation of a child protection nature, he or she will be required to live in alternative accommodation off site and away from the pupils. Ordinarily, this would mean a member of staff moving into their own private property but, if not available, the School would find alternative arrangements for such accommodation for the member of staff.

**10. Abuse of a pupil by another pupil**

The same procedures as for all safeguarding incidents should be followed in the case of abuse by one pupil against another. Such peer-on-peer abuse will never be tolerated or passed off as “banter” or “part of growing up”. Support for victims of peer-on-peer abuse will be provided through open communication with parents, staff and support staff.

It should be remembered that a bullying incident should be treated as a child protection concern when there is ‘reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm.’ Such bullying can include cyber-bullying, physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm, sexual violence and sexual harassment, initiation/hazing type violence and rituals.

‘Sexting’ (or youth produced sexual imagery): When such an incident comes to the School’s attention, it should be referred to the DSL as soon as possible. The DSL should hold an initial review meeting with appropriate school staff. There should be subsequent interviews with the young people involved (if appropriate). Parents should be informed at an early stage and involved in the process, unless there is good reason to believe that involving parents would put the young person at risk of harm. At any point in the process, **if there is a concern a young person has been harmed or is at risk of harm,** a referral should be made to Children’s Services and/or the Police immediately.

**11. Link to Disclosure and Barring Service**

If any person’s services (whether employed, contracted, a volunteer or a student) are no longer used because he or she is considered unsuitable to work with children, the Headmaster will report this information to the Disclosure and Barring Service within a month of his or her departure. The referral must be with immediate effect, if the member of staff caused or posed any significant harm.

**12. Links to Teaching Regulation Agency**

Where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate, the School is under a duty to consider making a referral to the Teaching Regulation Agency (TRA). The reasons such an order would be considered are: “unacceptable professional conduct”, “conduct that may bring the profession into disrepute” or a “conviction, at any time, for a relevant offence”

**13. Deficiencies or Weaknesses**

Following the Governors’ annual review or at any other time, any deficiencies or weaknesses in safeguarding or child protection arrangements will be remedied without delay.

**14. Availability of Policy**

This policy is available to parents upon request as detailed in the Information Booklet contained in the School Prospectus and is published on the School’s website.

**15. Abuse of trust**

All staff should clearly understand the need to maintain appropriate boundaries in their dealings with young people. The offence of ‘abuse of a position of trust’ is set out in the Sexual Offences Act 2003. The Act’s provisions mean that, subject to a number of limited defences, it would be a criminal offence for a person in a position of trust to engage in any sexual activity with a person aged under 18 with whom they have a relationship of trust, irrespective of the age of consent, even if the basis for their relationship is consensual. A relationship of trust exists one where a member of staff or volunteer is in a position of power or influence over a pupil or student by virtue of the work or nature of the activity being undertaken. All staff should ensure that their relationships with pupils are appropriate to the age and gender of the pupils, and take care that their language or conduct does not give rise to comment or speculation. Attitudes, demeanour and language all require care and thought, particularly when members of staff are dealing with adolescent boys.

**16. Responsibility for Papplewick pupils by another organisation**

Where any staff from another organisation have sole responsibility for Papplewick pupils on another site, the School will obtain assurance from that organisation that such staff have undergone the appropriate checks.

**17. Missing in Education**

**A Child Missing from Education**

A child going missing from education is a potential indicator of abuse or neglect and such children are at risk of being victims of harm, exploitation or radicalisation. A child missing from education can be a warning sign of safeguarding considerations.

The Registrar at Papplewick will notify the Local Authority that a pupil’s name is to be deleted from the admission register when a child leaves the School outside of the usual expected leaving age (i.e. at a non-standard time). The Registrar will also notify the pupil’s Local Authority. Where reasonable possible, Papplewick will try to hold more than one emergency contact number for each pupil (KCSIE Sept 2018).

The Registrar will supply the following: full name of the pupil; full name and address of any parent with whom the pupil lives; at least one telephone number of the parent with whom the pupil lives; full name and address of the parent with whom the pupil is going to live; date the pupil is expected to start living there; and the name of pupil’s destination school and the pupil’s expected start date there.

**18. Missing Pupil Policy**

If it is suspected that a child has gone missing, the Headmaster should be informed immediately or, in the absence of the Headmaster, the Deputy Headmaster or the most senior member of staff on site. The fire alarm will then be set off and a roll call taken to establish whether or not the boy is missing. A thorough search of the grounds and buildings will then be carried out. If the pupil is not found, the Police will be informed immediately along with the boy’s parents or guardians.

The same procedure will apply, if a boy is missing at night.

If a boarder fails to return after an exeat, half-term, or holiday without explanation, a Houseparent will telephone his parents to establish his whereabouts.

The Headmaster will keep a record of any incidents involving missing pupils. On the return of a missing pupil, consideration will be given by the Headmaster, in consultation with his Parents, Tutors, Form Teachers, Houseparents, School Nurse, or School Doctor as relevant, as to the most appropriate course of action. Such a course may include an element of discipline but proper consideration will be given to the support that such a boy is likely to need including the possibility of counselling or other specialist professional assistance.

**19. Visiting Speakers**

Visiting speakers to the School will be assessed for suitability. Permission to invite a speaker to the School, whether by a member of staff or pupil, should be sought from the Headmaster. He will assess their suitability through appropriate research into their background. If deemed necessary, a risk assessment for the event will be written.

**20. School Whistleblowing Policy**

The School’s Whistleblowing Policy is incorporated into the School Safeguarding Policy, a copy of which may be obtained from the School Office.

Staff should also feel able to raise concerns relating to any perceived failures in the School’s safeguarding processes through the School’s Whistleblowing procedures. In the event that a member of staff should feel unable to raise such concerns, or feel that a genuine concern is not being addressed, they may also wish to follow other whistleblowing channels including the NSPCC Whistleblowing Helpline for Staff (0800 028 0285).

**21. Staff Professional Code of Conduct**

The Staff Code of Conduct is incorporated into the School Safeguarding Policy, a copy of which may be obtained from the School Office.

**22. Other Links**

##### Expert and professional organisations are best placed to provide up-to-date guidance and practical support regarding specific safeguarding issues. Helpful links may be found within Keeping Children Safe in Education (DfE, September 2018): <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/707761/Keeping_Children_Safe_in_Education_-_September_2018.pdf>

**23. Child on child sexual violence and sexual harassment**

All staff should have regard of the following guidance: **Sexual Violence and Sexual Harassment between Children in schools and Colleges (DfE, May 2018).**

**(i) Responding to reports and incident**

Staff need to act immediately, if they have a concern about a child. Where a child has been harmed, is at risk of harm, or is in immediate danger, the staff and School should make a referral to the local children’s social care.

* Staff should be aware that sexual harassment covers a wide range of behaviours of an offensive nature that disturbs or upsets and is characteristically repetitive. This form of harassment is perceived to have a sexual reference and may be verbalised or involve a form of inappropriate physical contact.
* Sexual violence and harassment is not acceptable and will not be tolerated, therefore all concerns, discussions, decisions and reasons for decisions should be recorded and reported immediately to the DSL.
* Safeguarding training includes scenarios and examples of sexual violence and sexual harassment to help support staff to identify and recognise such incidents. The safeguarding training is conducted every three years for current staff members at the School. This safeguarding training is conducted upon the arrival of new staff. The safegaurading policy is signed off as read by all staff at Papplewick annually.

Immediate consideration should be given as to how best support and protect the victim and alleged perpetrator (and any other children/staff involved/impacted).

**(ii) Response to reports**

* Responding to reports, victims should be reassured immediately that the matter is being taken seriously. Victims should never be given the impression that they are creating a problem, nor should they ever be made to feel ashamed.
* Staff must not promise confidentiality and listen carefully to what is being said. Information should be shared with the DSL and only those people necessary in order to progress. The child should be informed of the next steps taken.
* Stuff should recognise that a child will disclose to someone they trust, and should therefore be supportive and respectful.
* Staff must not be judgemental and not asking leading questions. Children may be prompted by asking open questions, such as what, where, when and how.
* A written record of the facts (not personal opinion of the notetaker) should be made and should include dates, times and names of those conducting the report. If possible, two members of staff should be present including the DSL (DSL to be involved as soon as possible).
* Where the reports include an online element, the consideration is not to view or forward illegal images of the child.

**(iii) Risk Assessment**

* DSL should make an immediate risk and needs assessment in response to sexual violence and sexual harassment report. The risk assessment should consider the following: the victim, and their protection and support; the alleged perpetrator and anyone else at the School with whom there is contact or a direct link.
* The risk assessment should be kept under review and should actively consider the risks posed to all.
* The risk assessment should include adequate measures are put in place to ensure relevant protections and consider suitable action in light of the behaviour policy.
* The DSL should engage with Children’s Services and specialist agencies as required.

**(iv) Action following a report**

* The School should consider every report on a case-by-case basis.
* Staff should consider the safeguarding of the victim with immediate effect. This should also include the alleged perpetrator, any other children directly involved in the report and all children at the School.
* The staff should consider keeping the victim and the alleged perpetrator at a reasonable distance apart on the school premises where appropriate. The School should not wait for the outcome (or even the start) of an investigation by Children’s Services before protecting the victim and other children in the School.
* The DSL may consult with the police and Children’s Services on how to best proceed with the investigation and discuss how best to protect the victim and alleged perpetrator.
* The School should inform parents or carers, unless there are compelling reasons not to (e.g. the parent is likely to put the child at additional risk).
* Staff should consider: the wishes of the victim in terms of how they want to proceed, the nature of the alleged incident, the ages of the children involved, the development stages of the children involved, any power imbalance between the children, is the incident a one-off or a sustained pattern of abuse, are there ongoing risks to the victim, other children, school staff, or contextual safeguarding issues.

**(v) Ongoing response and Support**

* Where cases are classified as “no further action” or where there is a not guilty verdict, the School should continue to offer support to the victim and the alleged perpetrator.
* It should only be at the victim’s request (and following discussions with their parents or carers) that alternative provisions or a move to another school should be considered.
* If the victim or alleged perpetrator does move to another educational institution (for any reason), the School should ensure that the new educational institution is made aware of any ongoing support needs and where appropriate, potential risks to other children and staff.

**(vi) Sexual exploitation**

* Staff should be aware that sexual exploitation can take place in person or via technology, or a combination of both. It may occur without the child or young person’s immediate knowledge (e.g. through others copying videos or images they have created and posted on social media.
* Staff should understand that sexual exploitation can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity.
* Should staff have any concerns that some form of sexual exploitation has taken place, then they must report it immediately, where possible to the DSL.

**24. Criminal Exploitation – County Lines**

The School should be aware of the potential risks of children being used to carry drugs or money from urban to rural areas. Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of County Lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas.

* Staff should familiarise themselves with signs of criminal exploitation where initial contact and recruitment is often established through social media sites.
* Such abuse can affect any vulnerable child.

**25. Domestic Abuse**

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse *involving individuals who are, or have been, intimate* partners or family members regardless of gender or sexuality.

* Staff should recognise that abuse can encompass, but is not limited to psychological, physical, sexual, financial and emotional. The exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children.
* Staff should recognise that in some cases a child may blame themselves for the abuse or may have had to leave the family home as a result.
* Should staff have any concerns that some form of domestic abuse has taken place, then they must report it immediately, where possible to the DSL.
* Links to advice on identifying children who are affected by domestic abuse can be found in Annex A of *Keeping Children Safe in Education* (DfE, September 2018)

**26. Children and the Court System and Children with family members in prison**

* It is recognised that where children are required to give evidence in criminal courts either for crimes committed against them or for crimes they have witnessed, they are likely to be vulnerable.
* It is recognised that a similar vulnerability exists for those children with family members in prison.
* Further advice on both issues can be found in Annex A of *Keeping Children Safe in Education* (DfE September 2018)

**27. Homelessness**

* We recognise that homelessness, or being at risk of becoming homeless, presents a real risk to a child’s welfare. Although unlikely to occur in a Papplewick context, further advice on this issue can be found in Annex A of *Keeping Children Safe in Education* (DfE September 2018)

**28. Homestays**

* We recognise that in circumstances where we arrange for a visiting child to be provided with care and accommodation in the UK in the home of a family to which the child is not related, the responsible adults will be engaging in regulated activity for the period of the stay. In these circumstances, we will consider what intelligence/information will best inform our assessment of the suitability of those families who will be responsible for the visiting child including whether it is necessary to obtain a DBS enhanced certificate with barred list information on the responsible adults concerned.
* If staff are on a tour (abroad with children from the School) and the children are sent to the home of a family to which the child is not related, the responsible adults will be engaging in regulated activity for the period of the stay. In these circumstances, we will use our professional judgement to satisfy ourselves that the arrangements in place are appropriate and sufficient to safeguard effectively every child.
* Further advice on both issues can be found in Annex A of *Keeping Children Safe in Education* (DfE September 2018)

**29. Links to Children and Social Work Act 2017**

Designated Teachers: <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/683561/The_designated_teacher_for_looked-after_and_previously_looked-after_children.pdf>

Virtual Headteachers:

<https://www.gov.uk/guidance/pupil-premium-virtual-school-heads-responsibilities>

Children and Social Work Act 2017:

http://www.legislation.gov.uk/ukpga/2017/16/pdfs/ukpga\_20170016\_en.pdf

**30. Monitoring and Evaluation of this policy**

**The School monitors and evaluates its Safeguarding (Child Protection) Policy and procedures through the following activities:**

* Annual review and sign off by the Governing Body
* Governor visits to the school including a termly visit from the Safeguarding Governor
* Senior leadership and management team discussions
* Staff meetings
* Pupil questionnaires
* Scrutiny of attendance data
* Regular analysis of a range of risk assessments
* Regular analysis of appropriate provision for the fulfilment of other safeguarding responsibilities relevant to the school [e.g. sufficient account must be taken of the nature, age range and other significant features of the school, such as historical issues, in the provisions made for safeguarding].
* Termly scrutiny by Governors and reference to Child Protection in all governor meeting minutes
* A log of serious incidents (including bullying and/or racist behaviour) is kept by the Deputy Headmaster
* Regular review of parental concerns and parental questionnaires
* Regular review of the use of pupil common rooms
* Regular review of the pupil committee minutes

**Signed: ………………………. A.R.McGregor (Safeguarding Governor)**

**Signed: ………………………. A.R.E. Hutchinson (Chairman of Governors)**

**Signed: ………………………. T.W. Bunbury (Headmaster)**

**September 2018**

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| **JOB SPECIFICATION****DESIGNATED SAFEGUARDING LEAD (DSL)**  |
| **Key responsibility:** The DSL takes **lead responsibility** for safeguarding and child protection. The DSL is supported by other trained professionals within the School, but the **lead responsibility** for safeguarding and child protection remains with the DSL at all times and is not delegated to any other trained members of staff (including the Deputy DSL).  |
| **Areas of responsibility****Managing referrals*** For child protection concerns refer all cases of suspected abuse to the Royal Borough of Windsor and Maidenhead Safeguarding Children’s Board and the LADO.
* In cases where a member of staff is dismissed or leaves due to risk / harm to a child refer all cases to the Disclosure & Barring Service and / or the Police (in cases where a crime may have been committed).
* Support staff who make a direct referral to the local authority children’s social care.

**Working with others*** Liaise with the Deputy DSL to inform her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
* As required, liaise with the “case manager” and the designated officer at the local authority for child protection concerns (all cases which concern a staff member).
* Liaise with staff members on matters of safety and safeguarding and when deciding whether to make a referral by liaising with the relevant agencies.
* Act as a source of support, advice and expertise to staff on matters of safety, safeguarding and Prevent.

**Training**Receive appropriate training carried out every 2 years in order to:* Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
* Have a working knowledge of how local authorities conduct child protection case conferences and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
* Ensure each member of staff has access to and understands the school’s child protection policy and procedures , especially new and part time staff;
* Be alert to the specific needs of children in need, those with special educational needs and young carers;
* Be able to keep detailed, accurate, secure written records of concerns and referrals;
* Understand and support the school with regards to the requirements of the Prevent duty and be able to provide advice and support to staff on protecting children from the risk of radicalisation;
* Obtain access to resources and attend any relevant or refresher training courses;
* Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

In addition to the formal training, the DSL should also ensure their knowledge and skills are refreshed (via e-bulletins, meeting other DSLs, reading and digesting safeguarding developments) at regular intervals to allow him to understand and keep up with any developments relevant to the DSL role.**Raising Awareness**The designated safeguarding lead must ensure the school’s policies are known and used appropriately:* Ensure the School’s Child Protection and Safeguarding Policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with the Governing Body regarding this
* Ensure the Child Protection and Safeguarding Policy is available publicly and parents are made aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this
* Link with the local safeguarding partners to make sure staff aware of training opportunities and the latest local policies on safeguarding
* Where children leave the school ensure their child protection file is copied for any new school as soon as possible but transported separately from their main pupil file.

**Availability*** During term-time the DSL (or a deputy) should always be available during school hours for staff in school to discuss any safeguarding concerns.
* It is the responsibility of the DSL to arrange adequate and appropriate cover arrangements for any out of hours / out of term activities.
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| **JOB SPECIFICATION****DEPUTY DESIGNATED SAFEGUARDING LEAD (DSL)**  |
| In the absence of the Designated Safeguarding Lead, the Deputy Designated Safeguarding Lead will fulfil all duties as outlined below whilst acknowledging that at all times the **lead responsibility** for child protection and safeguarding remains with the DSL. |
| **Areas of responsibility****Managing referrals*** For children protection concerns, refer all cases of suspected abuse to the Royal Borough of Windsor and Maidenhead Safeguarding Children’s Board and the LADO.
* In cases where a member of staff is dismissed or leaves due to risk / harm to a child, refer all cases to the Disclosure & Barring Service and / or the Police (in cases where a crime may have been committed).
* Support staff who make a direct referral to the local authority children’s social care.

**Working with others*** Liaise with the DSL and Headmaster to inform them of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
* As required, liaise with the “case manager” and the designated officer at the local authority for child protection concerns (all cases which concern a staff member).
* Liaise with staff members on matters of safety and safeguarding and when deciding whether to make a referral by liaising with the relevant agencies.
* Act as a source of support, advice and expertise to staff on matters of safety, safeguarding and Prevent.

**Training**Receive appropriate training carried out every 2 years in order to:* Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
* Have a working knowledge of how local authorities conduct child protection case conferences and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
* Ensure each member of staff has access to and understands the school’s child protection policy and procedures , especially new and part time staff;
* Be alert to the specific needs of children in need, those with special educational needs and young carers;
* Be able to keep detailed, accurate , secure written records of concerns and referrals;
* Understand and support the school with regards to the requirements of the Prevent duty and be able to provide advice and support to staff on protecting children from the risk of radicalisation;
* Obtain access to resources and attend any relevant or refresher training courses;
* Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

In addition to the formal training, the Deputy DSL should also ensure their knowledge and skills are refreshed (via e-bulletins, meeting other DSLs, reading and digesting safeguarding developments) at regular intervals to allow him to understand and keep up with any developments relevant to the Deputy DSL role.**Raising Awareness**The Deputy DSL should support the DSL to ensure the school’s policies are known and used appropriately:* Ensure the School’s Child Protection and Safeguarding Policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with governing bodies regarding this
* Ensure the Child Protection and Safeguarding Policy is available publicly and parents are made aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this
* Link with the local safeguarding partners to make sure staff aware of training opportunities and the latest local policies on safeguarding
* Where children leave the school ensure their child protection file is copied for any new school as soon as possible but transported separately from their main pupil file.

**Availability*** During term-time the Deputy DSL should support the DSL in his absence by ensuring she is available during school hours for staff in school to discuss any safeguarding concerns.
* It is the responsibility of the DSL to arrange with the Deputy DSL for adequate and appropriate cover arrangements for any out of hours / out of term activities.
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