

Child Protection (Safeguarding) Policy

Lancing College & Lancing College Preparatory Schools



Lancing College

1 Policy statement

- 1.1 This policy applies to the whole College, encompassing both the Senior School (Years 9 to 13) and the Preparatory Schools (Nursery to Year 8).
- 1.2 Any reference in this policy to **the College** encompasses both the Senior School and the Preparatory Schools. Where *staff* are referenced in this policy this covers all staff, including ancillary and support staff and volunteers working with children.
- 1.3 This policy has been authorised by the Governors, is addressed to all members of staff and volunteers and is available on the Senior and Preparatory Schools websites and to parents on request. It applies wherever staff or volunteers are working with pupils even where this is away from the College, for example at an activity centre or on an educational visit.
- 1.4 This policy is also in compliance with the requirements of the National Minimum Standards for Boarding Schools (April 2015), and is in accordance with locally agreed inter-agency procedures established by Sussex Local Safeguarding Children Boards.
- 1.5 **EYFS:** This policy is appropriate for all children in Lancing College Preparatory Schools from age 3 to 13.
- 1.6 The policy is also appropriate for children in the Senior School from age 13 to 18.
- 1.7 The College aims to promote good behaviour amongst all of its pupils, with support, encouragement and guidance from all staff. As part of a happy and positive community, we expect all pupils to be diligent, honest and considerate in their relationship with others and we expect staff to treat pupils with kindness and fairness. In so doing we aim to create an environment in which all members of the College community can thrive and feel respected and valued.
- 1.8 Every pupil should feel safe and protected from any form of abuse (including that perpetrated by the use of technology ie cyberbullying) which, in this policy, means any kind of neglect, non-accidental physical injury, sexual exploitation or emotional ill-treatment.

The College recognises that children with special educational needs (SEN) and disabilities may be particularly vulnerable to bullying and abuse, and can face additional safeguarding challenges, which may include:

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

- 1.9 The College is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

The College's key duties are defined as:

- protecting children from maltreatment;
- preventing impairment of children's health or development;
- ensuring that children are growing up in circumstances consistent with the provision of effective care;
- undertaking that role so as to enable those children to have optimum life chances and to enter adulthood successfully;
- being alert to and aware of any child with a disability and taking appropriate action to ensure that he/she is not subject to any bullying in relation to the disability.

These aspects of safeguarding are cumulative and are pertinent with regard to various criteria by which the Senior School and the Preparatory Schools are assessed by ISI during inspections. Related criteria include the following:

- The staff provide effective support and guidance for the pupils in accordance with the school's aims and consider at all times what is in the best interests of the child.
- Relationships are positive between staff and pupils and among the pupils themselves.
- The school is effective in promoting good behaviour and guarding against harassment and bullying, and it deals constructively with any unacceptable behaviour, taking due account of any related difficulty or disability.
- The safeguarding arrangements have regard to official guidance [in *Working Together to Safeguard Children* (HM Gov July 2018); in *Keeping Children Safe in Education* (DfE September 2018); in *Prevent Duty Guidance for England and Wales* (HM Gov July 2015) and *The Prevent duty - Departmental Advice for Schools and Childcare providers* (June 2015) in *What to do if you are worried that a child is being abused – Advice for Practitioners* (HM Gov March 2015) in *Information Sharing: Advice to practitioners providing safeguarding services* (HM Gov July 2018) and in *Sexual Violence and Sexual Harassment in Schools and Colleges* [DfE May 2018] and in so doing take proper account of any particular circumstance or context of the school which may indicate a need for protocols greater than the minimum legal requirements.
- Arrangements are effective in ensuring compliance with the National Minimum Standards for Boarding Schools, particularly in matters of safeguarding boarders' welfare, staffing, management of behaviour and prevention of bullying.
- In the Early Years Foundation Stage, children's welfare is promoted effectively and the safeguarding of children is carefully ensured.

The following extract is from the College's separate and full Anti-Bullying Policy.

College Anti-Bullying Policy statement:

The College will aim to **“provide a safe, welcoming, supportive and tolerant environment in which each pupil feels valued as an individual, and, in turn, learns the importance of tolerance and consideration towards others”**.

The College operates zero tolerance towards bullying. Every pupil has a right to privacy and modesty within a safe and secure environment. The whole College community has a responsibility to ensure that this is achieved and should not fail to address any issues relating to bullying/abuse when they are encountered.

The College will therefore:

- ensure that we practise safe recruitment (including DBS checks) in checking the suitability of staff and volunteers (including staff employed by another organisation) to work with children and young people in accordance with regulations and statutory guidance given in *Working together to Safeguard Children* (HM Gov July 2018) and *Keeping Children Safe in Education* (DfE September 2018), the *Education (Independent School Standards) (England) Regulations* (HM Gov, revised January 2015), and the *National Minimum Standards for Boarding Schools* (April 2015);
- ensure that where staff from another organisation are working with our pupils on another site, we have received assurances that appropriate child protection checks and procedures apply to those staff;
- ensure that we carry out all necessary checks on the suitability of people who serve on the College's Governing Body in accordance with regulations and guidance given in *Keeping Children Safe in Education* (DfE September 2018);
- ensure that induction training is in place for all staff and volunteers and that all staff are familiar with the contents of this policy, with the *Lancing College Staff Code of Conduct* and with Part 1 of *Keeping Children Safe in Education* (DfE September 2018) and that all staff who work directly with children are familiar with *Annex A of KCSIE* (September 2018);
- ensure that any temporary or voluntary staff are made aware of the arrangements for Child Protection and Safeguarding;
- ensure, in accord with *The Prevent duty - Departmental Advice for Schools and Childcare providers* (June 2015), that all visiting speakers are vetted as being suitable and are appropriately supervised;
- ensure that where the College ceases to use the services of any person (whether employed, contracted, a volunteer or student) because that person was considered unsuitable to work with children, a detailed report is made to the Disclosure and Barring Service promptly, and in any event, within one month;
- ensure that all staff who work at any time with children under the age of 8, or who are directly concerned in the management of early or such later years provision as is covered by the Regulation, are not disqualified under the Childhood (Disqualification) Regulations 2009;

- follow the local inter-agency procedures of the West Sussex, East Sussex and Brighton and Hove Local Safeguarding Children Boards;
- ensure that staff understand that they have the responsibility to identify children who may be in need of additional support or who are suffering, or are likely to suffer, significant harm and that staff further recognise their responsibility then to take appropriate action (to include working with other services, as necessary);
- protect each pupil from any form of abuse, whether from an adult or another pupil, being alert to the possibility of peer on peer abuse [eg sexual assault between young people, sexting, an imbalance of power in a relationship, initiation rituals or 'banter'];
- be alert to signs of abuse both in the College and from outside;
- deal appropriately with every suspicion or complaint of abuse;
- design and operate procedures which promote this policy;
- design and operate procedures which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false allegations;
- support children who have been abused in accordance with their agreed child protection plan;
- be alert to the medical needs of children with medical conditions;
- be alert to the needs of pupils at risk of emotional or mental ill-health;
- operate robust and sensible health & safety procedures;
- take all practicable steps to ensure that College premises are as secure as circumstances permit;
- operate clear and supportive policies on drugs, alcohol and substance misuse;
- educate and guide children on measures to keep themselves safe, including the safe use of the internet and digital technologies;
- be alert to the possibility of sexual violence and sexual harassment occurring between children
- consider and develop procedures to deal with any other safeguarding issues eg the risk or radicalisation, of FGM or of going missing from education which may be specific to individual children in our schools or in our local area, including cared for children;
- have regard to guidance issued by the Secretary of State for Children, Schools and Families in accordance with section 157 Education Act 2002 and associated regulations;
- ensure that any deficiencies or weaknesses in regard to Child Protection arrangements are remedied without delay.

All child protection issues will be dealt with in accordance with the procedures detailed in this policy and in line with the guidelines regarding staff/pupil relationships, both of which are detailed in the relevant Staff Handbook.

- 1.10 All senior pupils at the Senior School (School Prefects/Heads of House/House Captains) who are given responsibility over other pupils are given Child Protection training each year in line with Standard 19 of the National Minimum Standards for Boarding Schools (NMS19). This briefing includes the appropriate action to be taken should they receive any allegation of abuse; ie senior pupils should:
- always respond to any incident that concerns them: if it does not feel right then they should do something about it;
 - encourage actively the passing on of concerns and the culture of a 'telling' school
 - assist younger pupils who may well seek their advice;
 - assist a pupil who has a known disability who may seek their support;
 - endeavour to calm any pupil who is in distress and assure him/her that they will assist them in any way they can, but must not give a guarantee of absolute confidentiality;
 - seek assistance when the situation is calm;
 - always pass on information relating to pupil distress to their respective Housemaster /Housemistress however minor or insignificant it may appear;
 - be aware that additional support is available from other members of staff including: House tutors, School Chaplain, School Counsellor, Head Master, Senior Deputy Head, Deputy Head, Assistant Head (Pastoral) and be aware of the Safeguarding structures of the school and that child protection concerns should always be referred to the DSL.
- 1.11 Pupils across the three schools are taught about keeping themselves and others safe, including online safety, through the curriculum, through PSHE, and through assemblies, discussions, presentations (including sessions for parents) and individual advice and guidance.
- 1.12 Every complaint or suspicion of abuse from within or outside the College will be referred to the appropriate external agency: the Children's Social Care Services department of the local authority or the child protection unit of the police (**CPU**) within 24 hours.

2 The Designated Safeguarding Lead

- 2.1 The College has appointed a member of the Senior Management Team with the necessary status and authority (Designated Safeguarding Lead) to have overall responsibility for matters relating to child protection and welfare for both the Senior School and the Preparatory Schools. The current Designated Safeguarding Lead (DSL) is the Senior Deputy Head, Mrs Hilary Dugdale, who may be contacted on 01273 465812 or hrd@lancing.org.uk. The DSL and/or a deputy will always be available in term time for staff to discuss any safeguarding concerns and appropriate cover arrangements are put in place for any out of term activities. The main responsibilities of the DSL are:

- to co-ordinate the child protection procedures for the College;
- to be the first point of contact for/with external agencies in all matters of child protection for the College;
- to manage referrals, referring all cases of suspected abuse to the local authority children's social care and to the LADO (if the case concerns a staff member); the DBS (where a person is dismissed due to risk/harm to a child) and/ or the Police (where a crime may have been committed);
- to be the first point of contact for parents, pupils, teaching and non-teaching staff at the Senior School;
- to arrange and maintain an ongoing training programme, including induction training (which includes online safety), in safeguarding matters for all College employees, volunteers and Governors;
- to act as a source of support, advice and expertise to staff on matters of safety and safeguarding;
- to monitor the keeping, confidentiality and storage of records in relation to child protection; to keep detailed, accurate, secure written records of concerns and referrals, to request child protection files from the previous school of those pupils joining the College and to ensure that the child protection file of those pupils leaving Lancing is transferred to their new school or college as soon as possible;
- to work closely with the IT department and other staff to ensure an effective and proactive approach to online safety including ensuring that appropriate filters and monitoring systems are in place to ensure that children are, as far as is practicable, protected from risks posed by negative digital **content**, **contact** and **conduct**, and ensure through the PSHE programme and other areas of the curriculum that children are taught how to stay safe online.
- to be the nominated member of staff responsible for looked-after children, including those who are fostered;
- to consider the context within which safeguarding incidents and/or behaviours occur – i.e. contextual safeguarding, ensuring that 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.
- to liaise with the child protection officer appointed by the Local Safeguarding Children Board (Local Authority Designated Officer);
- to have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and to attend and contribute to these and any other appropriate strategy meetings as required;
- to receive updated Child Protection training, in this role every two years and to keep knowledge and skills updated at least annually, undertaking such training as is required in inter-agency working, in participation in child protection case conferences, in supporting children in need, in the *Prevent* strategy in identifying children at risk of radicalisation, in record keeping and in promoting a culture of listening to children;

- to encourage a culture of listening to children and prioritising of their wishes and feelings among all staff, ensuring that each member of staff has access to and understands the school's child protection policy and procedures.

She will:

- advise and act upon all suspicion, belief and evidence of abuse reported to her;
- keep the Head Master of the Senior School informed of all actions (at both the Senior School and the Preparatory Schools) unless the Head Master is the subject of a complaint. In this situation, the DSL will report this to Dr Harry Brünjes, the Chairman of the Governing Body, or in his absence to Mr Martin Slumbers, the Vice Chair;
- liaise with children's social care and other agencies on behalf of the College;
- liaise regularly with the nominated persons for child protection matters at the Preparatory Schools.

The DSL has three deputies: Ms Anne McKane (Acting Assistant Head, Pastoral) at the Senior School, Dr Carole Cooper (Director of Studies) at Lancing Prep Hove and Mr Keith Richards (Senior Master) at Lancing Prep Worthing. The deputy DSLs are trained to the same level as the DSL.

2.2 Ms Anne McKane has been appointed to be the DSL's deputy for the Senior School. She will:

- Work alongside the Designated Person to assist in performing those responsibilities listed in 2.1 above;
- deputise in all matters of child protection in the absence of the DSL.

2.3 Dr Carole Cooper and Mr Keith Richards have been appointed to be the DSL's deputy with particular responsibility for Lancing Prep Hove and Lancing Prep Worthing respectively. In consultation with the DSL they will:

- be the first point of contact for parents, pupils, teaching and non-teaching staff at the Preparatory School in all matters of child protection;
- co-ordinate the child protection procedures at the Preparatory School;
- help co-ordinate ongoing training programmes for all Preparatory School employees;
- monitor the keeping, confidentiality and storage of records in relation to child protection at the Preparatory School;
- advise and act upon all suspicion, belief and evidence of abuse reported to them;
- keep the Head Master/ Head of the Preparatory Schools informed of all actions unless the Head Master/ Head is the subject of a complaint. In this situation they will report this to Dr Harry Brünjes, the Chairman of the Governing Body, or in his absence to Mr Martin Slumbers, the Vice Chair;

- as delegated by, and following consultation with, the DSL for the College, liaise with the LSCB's Local Authority Designated Officer and other external agencies on behalf of the Preparatory School;
 - liaise regularly with the DSL for the College.
- 2.4 If the Designated Safeguarding Lead is unavailable or is herself the subject of a complaint (whereby the Head Master would be informed immediately as per procedures outlined in section 5.3), her duties will be carried out by Ms Anne McKane, who has received appropriate training.
- 2.5 The Designated Safeguarding Lead for the College has undertaken training in child protection and interagency working to the appropriate level (recorded at Annex A). The deputies have undertaken child protection training to the same level. All will receive refresher training at two-yearly intervals.

3 Signs of abuse

- 3.1 Abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.
- 3.2 **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. Forms of abuse come under four distinct headings: Physical, Sexual, Emotional and Neglect. They are defined in *Keeping Children Safe in Education* (2018) as follows:
- 3.3 **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- 3.4 **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- 3.5 **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as

masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

3.6 **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, 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 and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

3.7 Possible signs of abuse include (but are not limited to):

- the pupil says s/he has been abused or asks a question which gives rise to that inference;
- there is no reasonable or consistent explanation for a pupil's injury; the injury is unusual in kind or location; there have been a number of injuries; there is a pattern to the injuries;
- the pupil's behaviour stands out from the group or there is a sudden change in the pupil's behaviour;
- heightened anxiety (eg shying away from being touched/flinching at sudden movements) and/or low self-esteem;
- knowledge of sexual matters beyond what would normally be expected;
- property and work damaged or lost more than is usual for the age group;
- a pupil becoming withdrawn and reluctant to say why;
- the pupil's development is delayed;
- the pupil loses or gains significant weight;
- a pupil going missing or absent from school, particularly on repeat occasions;
- the pupil appears neglected, eg dirty, hungry, inadequately clothed;
- the pupil is reluctant to go home, or has been openly rejected by his/her parents or carers.

The above list does not cover every aspect of child abuse. Staff may observe or become aware of other things that worry them and should always share concerns with the DSL.

- 3.8 **Other Types of Abuse:** Staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger.
- 3.9 All staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to:
- bullying (including cyberbullying);
 - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
 - sexual violence and sexual harassment;
 - sexting (also known as youth produced sexual imagery); and
 - initiation/hazing type violence and rituals.
- 3.10 All staff should be clear as to the school or college's policy and procedures with regards to peer on peer abuse.
- 3.11 Other Safeguarding issues can also be linked to (for example); child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse; female genital mutilation; forced marriage; gangs and youth violence; gender-based violence/violence against women and girls; radicalisation; relationship abuse and trafficking.

Child Sexual Exploitation: is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online.

So Called '**Honour Based' Violence:** encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. There is a statutory duty on teachers to report personally to the Police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Other staff should report to the DSL.

Forced Marriage: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. Staff can contact the Forced Marriage Unit if they need advice or information: Contact: 0207 008 0151 or email fm@fco.gov.uk.

Domestic violence and Abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological, physical, sexual, financial and emotional and a child witnessing domestic violence against another/others will be emotionally harmed.

Radicalisation: Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular have become major factors in the radicalisation of young people. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and refer concerns to the DSL.

Special Educational Needs and/or Disabilities: Pupils with SEND may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect. Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

Children who go missing from school: A child going missing from school is a potential indicator of abuse or neglect. The School will report to the local authority and the local authority where the child is normally resident if a pupil fails to attend school regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more. The School shall inform the local authority of any pupil who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006.

The issues listed above, along with gang and youth violence, fabricated or induced illness and faith abuse are all extremely serious matters and are covered in KCSIE, with which all staff should be familiar. In addition, further guidance can be found in specific documents (which are also available on the VLE):

- Guidance on Forced Marriage
- Sexual violence and sexual harassment between children in schools and colleges
- Children Missing Education
- CSE Guidance
- Prevent Duty Advice for Schools

4 Duty of employees, Governors and volunteers

4.1 Every employee and Governor of the College as well as every volunteer who assists the College is under a general legal duty:

- to identify concerns early, provide help for children, and prevent concerns from escalating;
- to provide a safe environment in which children can learn;
- to protect children from abuse;
- to be aware of the College's child protection procedures and to follow them;
- to have read at least Part 1 of *Keeping Children Safe in Education* (DfE September 2018) and, if working closely with children to have read Annex A;
- to have read and to follow the staff *Code of Conduct* (including the *Whistleblowing Policy*) as detailed in the relevant Staff Handbook. This includes guidance on staff/pupil relationships and communications, including the use of social media;
- to be aware of systems within their school or college which support safeguarding and which will be explained to them as part of staff induction. This should include: the *child protection (safeguarding) policy*; the *promoting good behaviour policy*; the safeguarding response to children who go missing from education; and the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).
- to know how to access and implement the Sussex Child Protection and Safeguarding procedures, independently if necessary. These procedures are available as an electronic copy at <http://pansussexscb.proceduresonline.com/index.htm>
- to be aware of the early help process and understand their role in this. This includes identifying emerging problems, liaising with the DSL and sharing information with other professionals in undertaking an early help assessment;
- to be aware of the process for making referrals to children's social care and for statutory assessments that may follow such referral, along with the role they might be expected to play in such assessments;
- to know what to do if a child tells them he/she is being abused or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality whilst keeping a sufficient record of any significant complaint, conversation or event and passing this on to the Designated Safeguarding Lead within the same day as the concern arises. This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputy) and children's social care. Staff should never promise a child that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child.
- to report any matters of concern to the Designated Safeguarding Lead or one of the four deputies;
- to call the police (999) if a child is at immediate risk of significant harm;

- if a teacher, to report to the police (a mandatory duty) any case where they discover that an act of Female Genital Mutilation (FGM) appears to have been carried out - discussing such a case with the DSL who will involve Children's Social Care as appropriate.
- to undertake appropriate training, including induction training within their first days at the College and/update training at regular intervals (recorded at Annex A), in addition to receiving and noting informal updates (eg via email and staff meetings) which will occur at least annually;
- to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, all staff should always act in the interests of the child;
- to be active in reinforcing the anti-bullying policy and active in challenging unacceptable behaviour eg 'banter', discriminatory or derogatory language and attitudes and online behaviour which may occasion harm
- to support the teaching and guidance that takes place pastorally as well as through the PSHE and ICT curriculum on keeping safe and e-safety. Details of this provision can be found in the Anti-Bullying and PSHE policies.

4.2 **Whistleblowing:** All College staff are required to report to the Designated Safeguarding Lead, the Head Master/ Head, or one of the four deputies any concern or allegations about poor or unsafe practice and potential failures in the College's safeguarding regime. They should expect that such concerns be taken seriously. In exceptional cases such reports should be made to ISI. There will be no retribution or disciplinary action taken against a member of staff for making such a report provided that it is done in good faith. The College's *Whistleblowing Policy* is contained in the relevant Staff Handbook and the importance of this policy and of a culture of safety where concerns are raised and unsafe practice is challenged is highlighted in child protection training. The *NSPCC whistleblowing helpline* is available for staff who do not feel able to raise concerns regarding child protection failure internally, tel. 0800 028 0285; email help@nspcc.org.uk.

4.3 **Safer Recruitment:** The College's recruitment and selection policy and procedures, including required checks for all staff, is in accord with the requirements of Part 3 of *KCSIE* (September 2018).

4.4 **Early Help:** Any child may benefit from early help, but all school and college staff should be 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 in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from care or from home;
- is misusing drugs or alcohol themselves;
- Is at risk of modern slavery, trafficking or exploitation;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- has returned home to their family from care;

- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;
- is a privately fostered child.

5 Procedures

5.1 **Initial complaint:** An employee, Governor or volunteer suspecting or hearing a complaint of abuse:

- must listen carefully to the child and keep an open mind. Staff should not take a decision as to whether or not the abuse has taken place;
- should refrain from asking questions as far as possible and must not ask leading questions, that is, a question which suggests its own answer;
- must reassure the child but not give a guarantee of absolute confidentiality. The member of staff should explain that they need to pass the information to the Designated Safeguarding Lead or one of the four deputies who will ensure that the correct action is taken;
- must keep a sufficient written record of the conversation. The record should include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. The record should be signed by the person making it and should use names, not initials. The record must be kept securely and handed to the Designated Safeguarding Lead or one of the four deputies;
- must report any allegation of alleged abuse by a member of staff immediately to the Head Master (or the Senior Deputy Head in his absence), or the Chairman of the Governing Body if the allegation is about the Head Master. The DSL must, in addition, refer all cases of child abuse relating to staff to the LADO (*KCSIE, Part 4, Annex B, 2018*). The LADO will provide advice and then, if necessary, preside over the investigation or suspicion of abuse directed against anyone working in the school. All allegations are reported to the LADO immediately and within one working day at the latest.

Note that the above procedures should also be followed in the event of an allegation /complaint of abuse by one or more pupils against another pupil, or by an external individual, or where there are concerns that a child is at risk of being drawn into terrorism.

5.2 **Preserving evidence:** All evidence (for example, scribbled notes, text messages, clothing, tablets or computers) must be safeguarded and preserved.

5.3 **Reporting:** All suspicion or complaints of abuse must be reported to the Designated Safeguarding Lead or one of the four deputies immediately. If the complaint involves a member of staff, this must be reported to the Head Master.

If at any point there is a risk of immediate serious harm to a child, a referral should be made to children's social care immediately. Anyone can make this referral in the absence of being able to make contact with the DSL or her deputies. If the child's situation does not appear to be improving, a staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point.

If anyone other than the DSL makes the referral, they should inform the DSL as soon as possible.

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.

Information Sharing: *Advice for practitioners providing safeguarding services to children, young people, parents and carers* supports staff who have to make decisions about sharing information. This advice includes the seven golden rules for sharing information.

5.4 **Action by the Designated Safeguarding Lead:** The action to be taken will take into account:

- the local inter-agency procedures of the Local Safeguarding Children Boards of West Sussex, East Sussex and Brighton and Hove;
- the nature and seriousness of the suspicion or complaint. A complaint involving a serious criminal offence will always be referred to children's social care and/or the police without further investigation within the College;
- the wishes and feelings of the pupil who has made a disclosure, provided that the pupil is of sufficient understanding and maturity and properly informed. However, there may be times when the situation is so serious that decisions may need to be taken, after all appropriate consultation, that override a pupil's wishes;
- the wishes and views of the complainant's parents, provided they have no interest which is in conflict with the pupil's best interests and that they are properly informed. Again, it may be necessary, after all appropriate consultation, to override parental wishes in some circumstances. If the DSL is concerned that disclosing information to parents would put a child at risk, she will take further advice from the relevant professionals before making a decision to disclose;
- duties of confidentiality, so far as applicable;
- the lawful rights and interests of the College community as a whole including its employees and its insurers;
- if there is room for doubt as to whether a referral should be made, or to which body a referral should be made (eg to *Channel* or Children's Social Care for a child at risk of radicalisation) the DSL may consult with the Local Authority Designated Officer or other appropriate professionals on a no names basis without identifying the family. However, if sufficient concern exists that a child may be at risk of significant harm, or if there is suspicion of abuse and/or a disclosure is made, a referral will be made without delay and within 24 hours. If the initial referral is made by telephone, the Designated Person will confirm the referral in writing to children's social care also within 24 hours. If no response or acknowledgment is received within three working days, the Designated Person will contact children's social care again.

- **Child in Need.** If a child is not deemed to be suffering, or likely to suffer, significant harm but is deemed to be in need of additional support from one or more agencies, they should be referred to the DSL and will be assessed via the Common Assessment Framework (CAF) and the Team around the Child (TAC) approaches, in line with local inter-agency procedures.

- 5.5 **Referral guidelines:** It is key that children receive the right help at the right time to address risks and to prevent issues escalating. A referral to children's social care or police should be made when a child has suffered, or is likely to suffer, harm and/ or where a criminal offence has taken place. If necessary anyone can make such a referral. (See Annex B).
- 5.6 **External agencies:** In the event that the College decides not to refer a particular incident to the police, the parents and pupil will be informed of their right to make their own complaint or referral. Pupils and their parents have access to a complaints procedure in relation to issues affecting their welfare which provides contact details for ISI.
- 5.7 **Allegations against staff:** The College has procedures for dealing with allegations against staff (and volunteers who work with children) that aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false or unfounded allegations. These procedures follow the guidance in *Keeping Children Safe in Education [Part 4] (2018)*.

The College will not undertake its own investigations of an allegation without prior consultation with the LADO, or in the most serious cases the police, in order not to jeopardise statutory investigations.

Suspension will not be an automatic response to an allegation. Full consideration will be given to all the options, subject to the need to ensure:

- the safety and welfare of the pupils or pupil concerned; and
- the need for a full and fair investigation.

If a member of boarding staff is suspended pending a child protection investigation, arrangements will be made for alternative accommodation away from children.

Where an allegation or complaint is made against the Head Master of the Senior School or the Head Master/ Head of the Preparatory Schools, the person receiving the allegation should, without first notifying the Head Master/ Head, immediately inform the Chairman of the Governing Body (Dr Harry Brünjes), or in his absence the Vice Chair [contact details for both may be gained from Mrs Sharon Miles, the Bursar's PA, or in her absence from Mrs Hannah Betts, the Head Master's Assistant], who will consult with the relevant LADO.

Detailed guidance is given to staff to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil. This guidance is contained in the *Staff Code of Conduct* and the relevant Staff Handbook.

If the College ceases to use the services of a member of staff (or a Governor or volunteer) because they are unsuitable to work with children, a compromise agreement will not be used and there will be a prompt and detailed report to the DBS. Any such

incidents will be followed by a review of the safeguarding procedures within the College with a report being presented to the Governing Body without delay.

- 5.8 **Allegations against pupils:** A pupil against whom an allegation of abuse has been made may be suspended from the College during the investigation and the College's policy on behaviour, discipline and sanctions will apply.

In the instance where there is the allegation of abuse by one or more pupils against another pupil where there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm' then any such abuse will be referred to local agencies as a child protection concern. In the event of disclosure about pupil on pupil abuse, all children involved, whether perpetrator or victim, will be treated as being 'at risk'.

- 5.9 **Peer on Peer Abuse:** This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

The College seeks to ensure that the risk of Peer on Peer abuse is minimised by:

- Providing a developmentally appropriate PSHE programme which develops pupils' understanding of consent, acceptable behaviour and healthy relationships;
- Developing robust risk assessments and providing targeted work and support for pupils identified as being a potential risk to other pupils;
- Having systems in place for any pupils to raise concerns with staff knowing that they will be listened to, believed and valued;
- Clarity about how allegations of peer on peer abuse will be recorded, investigated and dealt with;
- Clear processes through which all children (victims, perpetrators and others affected by peer on peer abuse) will be supported;
- Recognition that all peer on peer abuse is unacceptable and will be taken seriously.

The College's *Policy on Peer on Peer Abuse* details this guidance in full.

- 5.10 **Sexual violence and sexual harassment between children in schools and colleges**
Context: Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk. Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and

- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

5.11 **Suspected harm from outside the College:** A member of staff who suspects that a pupil is suffering harm from outside the College should seek information from the child with tact and sympathy using "open" and not leading questions. A sufficient record should be made of the conversation and if the member of staff continues to be concerned he or she should refer the matter to the Designated Safeguarding Lead or one of the three deputies.

5.12 **Missing pupil (boarder or day):** All staff should follow the procedures outlined in the policy (refer to the relevant Staff Handbook) for searching for, reporting and recording any pupil (boarder or day) missing from school. The procedure includes the requirement to record any incident, the action taken and the reasons given by the pupil for being missing.

5.13 **Early Years Foundation Stage:**

- The first point of contact for parents, pupils, teaching and non-teaching staff in all matters of child protection will be Dr Carole Cooper at Lancing College Preparatory School at Hove; and Mr Keith Richards at Lancing College Preparatory School at Worthing.
- Use of mobile phones and cameras in the EYFS setting: Children have their photographs taken to provide evidence of their achievements for developmental records (*The Early Years Foundation Stage*, EYFS 2018). Staff, visitors, volunteers and students are not permitted to use their own mobile phones, ipads or cameras to take or record any images of children for their own records during session times but instead must use the school cameras or ipads purchased or provided for the purpose. Staff may take photographs of children in the EYFS setting using a school camera or ipad for the following purposes: in order to provide evidence of any practical educational activities or outdoor learning that has taken place during the day, or on school trips to document their outing for newsletters and for their learning journey. Staff must regularly delete all photos and videos from such devices.

6 Monitoring

6.1 The Designated Safeguarding Lead will monitor the operation of this policy and its procedures and make an annual report to the Governors.

6.2 The Governing Body will undertake an annual review of the College's child protection policies and procedures and of the efficiency with which the related duties have been discharged. The member of the Governing Body taking leadership responsibility for the College's safeguarding arrangements is Mrs Anne-Marie Edgell.

6.3 The Governors will ensure that any deficiencies or weaknesses in regard to child protection arrangements are remedied without delay.

6.4 The Governors, through the Bursar, will ensure appropriate child protection checks apply to all staff including supply staff, governors, volunteers, employees of other organisations

spending extended time on the College premises, or working with the College's pupils on another site (for example in a separate institution).

- 6.5 The Governors, through the Head Master, will ensure that where the College ceases to use the services of any person (whether employed, contracted, a volunteer or student) because that person was considered unsuitable to work with children, a report is made to the Disclosure and Barring Service (DBS) within one month of the person leaving the College. The Governors have noted that failure to make a report constitutes an offence.
- 6.6 Independent schools are also under a duty to report to the TRA where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. 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'. In such circumstances the Head Master will consider making such a referral, following the guidance in the TRA website.

7 Contact numbers

- 7.1 West Sussex Safeguarding Children Board: 0330 222 5296
West Sussex Multi-Agency Safeguarding Hub: MASH@westsussex.gov.uk
01403 229 900 or 0330 222 6664 (out of hours)
Brighton and Hove Multi-Agency Safeguarding Hub:
MASH@brighton-hove.gov.uk
01273 290 400

- 7.2 West Sussex Local Authority Designated Officer
(Safeguarding in Education and Allegations Management):
Lindsey Tunbridge-Adams 0330 222 3339
Email: lindsey.tunbridge-adams@westsussex.gov.uk
Or the Deputy West Sussex LADO:
Claire Coles: 0330 222 3339
Email: claire.coles@westsussex.gov.uk

Brighton and Hove Local Area Designated Officer:
Darrel Clews: 01273 295 643

West Sussex Safeguarding and Education Manager:
Jez Prior 0330 222 4030

- 7.3 Disclosure and Barring Service: 01325 953795

- 7.4 The following contact details may be useful for staff or pupils:

Hilary Dugdale (DSL, Lancing College): HRD@lancing.org.uk; 01273 465812
Anne McKane (Deputy DSL, Lancing College) AM@lancing.org.uk
Carole Cooper (DSL, Lancing Prep Hove) CAC@lancing.org.uk
Keith Richards (DSL, Lancing Prep Worthing) Krichards@lancing.org.uk

West Sussex (Chichester) Child Contact Centre	01243 538 080
Brighton and Hove Child Contact Centre	01273 295 999
Childline	0800 1111
NSPCC	0808 800 5000

Child Exploitation and Online Protection Centre	www.ceop.police.co.uk
Senior School Counsellor: Mrs Jacqui Painter	07748 179218
Independent Schools Inspectorate	0207 600 0100
DfE Support and Advice about Extremism	0207 340 7264
Office of the Children’s Commissioner	0207 783 8330

8 Links to other policies

This policy is linked to and underpinned by a number of other policies sent to staff prior to their commencement of employ*, available to staff on the VLE and through the Staff Handbook or available in hard copy by request:

- Policy for the Induction of New Staff in Child Protection*
- Staff Code of Conduct*
- Anti-bullying Policy
- Recruitment Policy
- Policy to Promote Good Behaviour [pupils]
- Promoting Fundamental British Values Policy
- Supervision Policy
- Whistleblowing Policy
- Policy for Dealing with Allegations of Abuse
- Access to School Premises Policy
- Child Missing From Education Policy
- Peer-on-Peer Abuse Policy

Authorised by	resolution of The Governing Body
Date	3 September 2018 Review Date: June 2019
Effective date of the policy	Amended and updated with effect from 6 June 2018
Circulation	Governors/all staff/volunteers automatically Available on website Parents on request
Status	Complies with paragraph 3(2)(b) of the <i>Schedule to the Education (Independent School Standards) (England) Regulations 2015</i> , the <i>National Minimum Standards for Boarding Schools, Working Together to Safeguard Children</i> (HM Gov July 2018) and <i>DfE guidance Keeping Children Safe in Education</i> (September 2018)

Annex A

A1 Record of Designated Person's recent Safeguarding / Child Protection training

- *Dealing with complex parental appeals* – Farrers – 14 March 2018
- *Preventing Radicalisation and Violent Extremism W Sussex LSCB* – 23 November 2017
- *BSA Safeguarding Conference* – 15 November 2017
- *BSA Safeguarding Conference* – 20 October 2017
- CPU Annual Safeguarding Conference – 29 September 2017
- *DSL Refresher Training, W Sussex LSCB* – 21 September 2017 (Hilary Dugdale) and 11 November 2016 (Anne McKane, Dan Connolly, Keith Richards and Carole Cooper)
- *Child Protection in Education* – updated guidance and new legal obligations, Optimus Education Conference, London – 13 September 2017 (Carole Cooper)
- *Kidscape Advanced Child Protection Training* – 13 June 2017
- *Signs of Safety and Wellbeing, W Sussex LSCB* – 24 May 2017

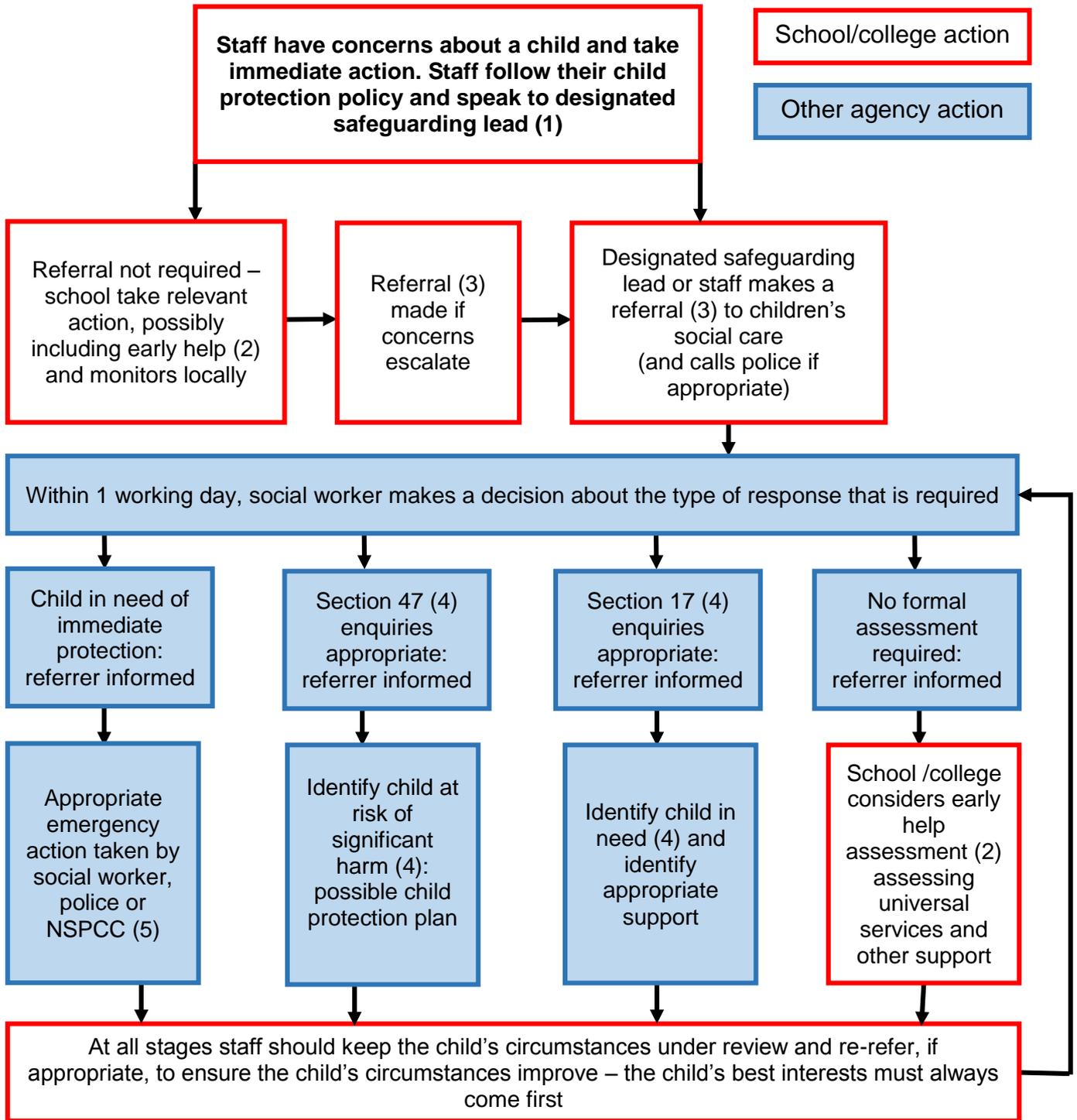
A2 Record of recent Safeguarding/Child Protection training at Lancing College

- Safeguarding/Child Protection training/update for teaching staff
 - 5 June 2018 *Counselling for the Non-Counsellor*, BSA
 - 27 February 2018 *Mental Health First Aid*, MHFA England
 - 1 September 2017
 - 13 June 2017 *Kidscape Advanced Child Protection Training*
 - 6 January 2017
 - 18 April 2016
 - 6 November 2015 *Child Sexual Exploitation (W Sussex lead to safeguarding leads)*
 - 19 May 2015
- Safeguarding/Child Protection training/update for new teaching and support staff
 - 16 April 2018
 - 9 January 2018
 - 30 August and 1 September 2017
 - 9 May 2017
 - 18 April 2017
 - 6 January 2017
 - 1 and 8 September 2016

- Safeguarding/Child Protection training/update for support staff & volunteers
 - 22 April 2018 (Chapel Guides)
 - 16 April 2018 (support staff)
 - 31 March 2018 (examination invigilators)
 - 28 September 2017 (College drivers)
 - 25 September 2017 (Visiting Music Teachers)
 - 23 April 2017 (Chapel Guides)
 - 1 April 2017 (examination invigilators)
 - 8 September 2016 (Visiting Music Teachers)
- Safeguarding/Child Protection training/update for Governors
 - 15 June 2018
 - 2 March 2018
 - 1 December 2017
 - 15 June 2017
 - 2 March 2017
- Safeguarding/Child Protection training for PGCE students
 - 19 February 2018
 - 30 September 2017
 - 28 September 2016
 - 29 September 2015
- Safeguarding/Child Protection training for GAP Assistants
 - 4 September 2017
 - 2 September 2016
 - 8 January 2016
 - 3 September 2015
- Safeguarding/Child Protection training for School Prefects
 - 13 September 2017
 - 14 September 2016
 - 16 September 2015
 - 10 September 2014
- Safeguarding training for Heads of House and House Captains
 - 13 & 18 June 2018
 - 7 September 2017
 - 8 September 2016
 - 10 September 2015
 - 4 September 2014
- Safeguarding/Child Protection training for Peer Supporters
 - 18 January 2018
 - 19 January 2017
 - 21 January 2016
 - 13 January 2015

Annex B - taken from *Keeping Children Safe in Education* (DfE September 2018)

Actions when there are concerns about a child



(1) In cases which also involve an allegation of abuse against a staff member, see Part four of this guidance.
 (2) Early help means providing support as soon as a problem emerges at any point in a child’s life. Where a child would benefit from coordinated early help an early help inter-agency assessment should be arranged. Chapter one of Working together to safeguard children provides detailed guidance on the early help process.
 (3) Referrals should follow the local authority’s referral process. Chapter one of Working together to safeguard children.
 (4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. This can include section 17 assessments of children in need and section 47 assessment of children at risk of significant harm - full details in Chapter one of Working together to safeguard children.
 (5) This could include applying for an Emergency Protection Order (EPO).