



Child Protection and Safeguarding Policy and Procedures

Cheltenham College

For the purposes of clarity the following terms will be used throughout the policy:-

'Cheltenham College' refers to Cheltenham College Senior School *and* Cheltenham College Preparatory School (including Cheltenham College Nursery School/EYFS)

'College' refers to Cheltenham College Senior School

'Cheltenham Prep' refers to Cheltenham College Preparatory School

'Pre-Prep' refers to Cheltenham College Nursery School / EYFS / Reception and Year 1 and 2

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Cheltenham College Contacts

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<p>Deputy Designated Safeguarding Leads</p> <p>College</p> <p>Mr Richard Penny</p> <p>Mr Chris Reid</p> <p>Mrs Michelle Lucas-Halliwell</p> <p>Prep Mr Kit Perona-Wright</p>	<p>Email: r.penny@cheltenhamcollege.org Tel: 07703 570805</p> <p>Email:c.reid@cheltenhamcollege.org Tel: 07810 551558</p> <p>Email: m.lucas-halliwell@cheltenhamcollege.org</p> <p>Email: K.Perona-Wright@cheltenhamcollege.org Tel: 07740 477114</p>
<p>Heads College Mrs Nicola Huggett</p> <p>Prep Mr Tom O’Sullivan</p>	<p>Email: Head@cheltenhamcollege.org Tel: 01242 265628</p> <p>Email: prep.head@cheltenhamcollege.org Tel: 01242 706814</p>

President of Cheltenham College Council William Straker-Nesbit	Email: President@cheltenhamcollege.org Tel: 01242 265686 and ask to speak to President of Council
Nominated Safeguarding Council Member Mark Chicken	Email: CPCouncil@cheltenhamcollege.org Tel: 01242 265686 and ask to speak to Child Protection and Safeguarding Council Member
Cheltenham Early Help Team	01452 328160 cheltenhamearlyhelp@gloucestershire.gov.uk

1 Important External Contacts

- 1.1 The details of the designated officer are as follows:
Nigel Hatten (Local Authority Designated Officer)

Address: Shire Hall, Westgate Street, Gloucester, GL1 2TG

Telephone: 01452 426994

Email: nigel.hatten@gloucestershire.gov.uk

- 1.2 The telephone numbers of the Gloucestershire children's social care department are as follows:

Office Hours Tel: 01452 426565

Out of Hours (Emergency Duty Team): Tel: 01452 614194

If you believe a child is at immediate risk, the police should be contacted on 101 at any time.

If Female Genital Mutilation is suspected, staff should call 999 if there is imminent risk of harm, or a child is due to leave the country in the next 48 hours.

If there are concerns about FGM, but not imminent, then staff should call 01452 426565

Staff may wish to use the NSPCC Whistleblowing Advice Line if they are worried that a concern over a child is not being dealt with properly or being covered up, or a concern has not been acted upon, or that they are being treated unfairly for raising a concern.

Website: <https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/>

Tel: 0800 800 5000

Email: help@nspcc.org.uk

1.3 The telephone numbers of relevant Prevent partners are as follows:

101 (non-emergency Police number)

DfE dedicated helpline: 020 7340 7264 or
counter-extremism@education.gsi.gov.uk

Contacts for pupils:

Safeguarding Children In Gloucestershire – Children’s Helpdesk 01452 426565

Childline 0800 1111

Children's Commissioner 0800 528 0731

Independent Listener

Fiona Womersley Mobile: 07785994373
Email: fwomersley@aol.com

Student Support Services Tel: 01242 265629 ext 123

Related policies

1.3.1 This following policies and procedures are also relevant to Cheltenham College's safeguarding practices:

- (a) Staff Code of Conduct
- (b) Whistleblowing Policy

- (c) Recruitment Policy
- (d) Anti-bullying Policy
- (e) Behaviour Policy
- (f) Pupil ICT Acceptable Use Policy (P), Pupil ICT Acceptable Use Policy (C)
- (g) Staff ICT Acceptable Use Policy
- (h) Risk Assessment Policy for Pupil Welfare
- (i) Missing Pupil Policy
- (j) Policy on the administration of medicines and supporting pupils with medical conditions
- (k) Emotional Health and Well Being Policy
- (l) Visitor policy and guidance
- (m) Peer on Peer Abuse Guidance.
- (n) Relationship and Sex Education
- (o) Social Media Policy
- (p) Pupil Whistleblowing Policy
- (q) Guardianship POLICY

1.3.2 These policies are available to staff on Cheltenham College's Policy Portal and hard copies are available on request.

2 Policy statement

2.1 Cheltenham College's Child Protection and Safeguarding Policy and Procedures (**Policy**) has regard to statutory guidance *Keeping Children Safe in Education 2021 (KCSIE)* and *Working Together to Safeguard Children July 2018*, [Disqualification under the Childcare Act 2006] and *Prevent Duty Guidance for England and Wales 2015*, and:

- 2.1.1 has been authorised by the President and Council of College;
- 2.1.2 is published on the Cheltenham College website and available in hard copy on request;
- 2.1.3 can be made available in large print or other accessible format if required;

2.1.4 its procedures apply wherever staff, Council or volunteers are working with pupils even where this is away from Cheltenham College, for example an educational visit; and

2.1.5 also applies to the Early Years Foundation Stage (**EYFS**) Department.

2.2 **Every pupil should feel safe and protected from any form of abuse. Cheltenham College is committed to safeguarding and promoting the welfare of children and young people, particularly those who are in need or at risk, and expects all staff and volunteers to share this commitment.**

Cheltenham College will take all reasonable measures to:

2.2.1 ensure that we practise safer recruitment in checking the suitability of staff, Council and volunteers (including staff employed by another organisation) to work with children and young people in accordance with:

- Disqualification under the Childcare Act 2006;
- the Education (Independent School Standards) Regulations 2014;
- the National Minimum Standards for Boarding Schools 2015;
- the Statutory Framework for the Early Years Foundation Stage.

See also Cheltenham College's separate Recruitment Policy

2.2.2 ensure that where staff from another organisation are working with our pupils on another site, we require written confirmation that appropriate safer recruitment checks and procedures have been completed on those staff. As made clear in our Visitor Guidance policy, external speakers are subject to vetting before any event takes place in the school;

2.2.3 follow the local inter-agency procedures of the Gloucestershire Safeguarding Children Executive;

2.2.4 Be proactive in attempting to identify pupils who may be at risk;

2.2.5 be alert to signs of abuse both in Cheltenham College and from outside and to protect each pupil from any form of abuse or harm, whether from an adult or another pupil;

2.2.6 deal appropriately with every suspicion or complaint of abuse and to support children who have been abused in accordance with his / her agreed child protection plan;

- 2.2.7 design and operate procedures which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false allegations;
- 2.2.8 be alert to the needs of children with physical and mental health conditions;
- 2.2.9 operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol and substance misuse;
- 2.2.10 assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area;
- 2.2.11 identify children who may be vulnerable to radicalisation, and know what to do when they are identified;
- 2.2.12 teach pupils about safeguarding, for example through use of online resources, through the curriculum and Floreat and Thrive!, together with guidance on adjusting behaviour to reduce risks including the safe use of electronic devices and the internet, building resilience to protect themselves and their peers, and information about who they should turn to for help (see also Cheltenham College's Acceptable Use and Anti-bullying policy).
- 2.2.13 take all practicable steps to ensure that College premises are as secure as circumstances permit;
- 2.2.14 consider and develop procedures to deal with any other safeguarding issues which may be specific to individual children in Cheltenham College or in the local area; and
- 2.2.15 have regard to regulations and standards issued by the Secretary of State for Education (**DfE**) in accordance with section 94 of the Education and Skills Act 2008 and sections 29 and 38 of the Counter-Terrorism and Security Act 2015 and associated regulations.
- 2.2.16 is committed to ensuring that pupils' access to the internet and other forms of ICT is subject to a robust filtering system. Daily nightly checks are undertaken by a member of the DSL team. Any concerning searches are followed up with the pupil's HsM or resident tutor, either immediately or the next day, depending on the urgency of the search.
- 2.2.17 is committed to keeping children safe on-line.

- 2.2.18 ensure that pupils understand the need to comply with any necessary infection control measures put in place to protect themselves and others.
- 2.3 *Keeping Children Safe in Education* defines safeguarding and promoting the welfare of children as protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. The *Prevent Duty Guidance for England and Wales* emphasises that the duty to have due regard to the need to prevent children from being drawn into terrorism is an aspect of safeguarding. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. Schools should be safe spaces in which children and young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas.
- 2.4 *Keeping Children Safe in Education* provides that the inspection of independent schools will ensure that the Independent School Standards which concerns the welfare, health and safety of children are met.
- 2.5 If any pupil at Cheltenham College was considered to be a 'Looked after Child' (or previously looked after child) we would ensure that the DSL worked closely with the relevant Children's Services over care. If the parents retain parental responsibility then we will continue to report to parents, but will ensure that we have all the information about the child's care arrangements. The DSL will have details of the child's social worker. The child will automatically be on the Welfare Management Team List of vulnerable pupils, and will be discussed at DSL meetings.
- 2.6 All staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from EYFS through to Upper College. In the first instance staff should discuss early help requirements with the DSL or the DSL team. Staff may be required to support other agencies and professionals in an early help assessment. This includes identifying emerging problems, liaising with the DSL, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment. Pupils who may require Early Help may include pupils who: show signs of being drawn in to anti-social, serious violence or criminal behaviour, frequently missing from care or home, are at risk of modern slavery, trafficking or exploitation, show early signs of abuse and / or neglect, are at risk of being radicalized or exploited or are privately fostered.
- 2.7 Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Staff must:

- Be wary of making assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- Be aware that children with SEN and disabilities can be disproportionately impacted by things like bullying - without outwardly showing any signs; and
- Be aware of communication barriers and difficulties in overcoming these barriers
- Consider that some children are more prone to peer group isolation than other children

2.8 International children can be additionally vulnerable and therefore face safeguarding challenges. Staff should:

- Be wary of making cultural assumptions
- Be aware that international pupils may be more vulnerable to isolation or peer on peer harm and may not be fully able to communicate their experiences.
- Be aware of communication barriers and seek ways to overcome these barriers.
- Ensure that international pupils have an appropriate guardian (ref Guardianship Policy)

3 The Designated Safeguarding Lead

- 3.1 Cheltenham College's Council has appointed a member of staff with the necessary status and authority (**Designated Safeguarding Lead**) to be responsible for matters relating to child protection and welfare.
- 3.2 The Designated Safeguarding Lead shall be given the time, funding, training, resources and support to enable him/her to support other staff on safeguarding matters, to contribute to strategy discussions and/or inter-agency meetings and to contribute to the assessment of children.
- 3.3 Parents are welcome to approach the Designated Safeguarding Lead if they have any concerns about the welfare of any child in Cheltenham College. If preferred, parents may discuss concerns in private with the child's form teacher or the Head who will notify the Designated Safeguarding Lead in accordance with these procedures.
- 3.4 The name and contact details of the Designated Safeguarding Lead are set out in Cheltenham College Contact list at the front of this policy. They, together with the main responsibilities of the Designated Safeguarding Lead, are also set out in Appendix 1.

- 3.5 If the Designated Safeguarding Lead is unavailable his/her duties will be carried out by a Deputy Designated Safeguarding Lead. Deputy Designated Safeguarding Lead's details are also set out in Cheltenham College Contact list and in Appendix 1. In this policy, reference to the Designated Safeguarding Lead includes Deputy Designated Safeguarding Leads where the Designated Safeguarding Lead is unavailable.

4 Duty of staff, Council and volunteers

- 4.1 All staff, Council and volunteers of Cheltenham College are under a general legal duty:
- 4.1.1 to protect children from abuse;
 - 4.1.2 to be aware of the terms and procedures in this Policy and to follow them;
 - 4.1.3 to know how to access and implement the procedures in this Policy, independently if necessary;
 - 4.1.4 to keep a sufficient record of any significant complaint, conversation or event in accordance with this Policy; and
 - 4.1.5 to report any matters of concern to the Designated Safeguarding Lead immediately.
 - 4.1.6 Support staff in liaising with other agencies for early help.
- 4.2 Staff connected to Cheltenham College's Early Years and Later Years provisions are under an ongoing duty to inform Cheltenham College if their circumstances change which would mean they meet any of the criteria for disqualification under the Childcare Act 2006. Staff should refer to Cheltenham College's Recruitment Policy for further information about this duty and to their contract of employment in respect of their ongoing duty to update Cheltenham College.
- 4.3 College Council ensures that Cheltenham College's safeguarding arrangements take into account the procedures and practice of the Gloucestershire Safeguarding Children Executive. College Council has nominated one of its members to take leadership of Cheltenham College's safeguarding arrangements on behalf of the Board and to liaise with external agencies where this is required, including in the event of allegations of abuse made against the Head or a member of Council. The Nominated Safeguarding Council member is Mark Chicken. See the role and duties of the Nominated Safeguarding Council Member and President of College Council set out in Appendix 5.
- 4.4 All concerns, discussions and decisions made and reasons for those decisions should be recorded in writing. If in doubt staff should discuss issues with the DSL or the Deputy DSLs.

4.5 Training

4.5.1 Induction

- (a) All staff, including temporary staff and volunteers, will be provided with induction training that includes:
 - (i) this Policy; including details of Children Missing in Education details.
 - (ii) the Staff Code of Conduct including the whistleblowing procedure and online safety
 - (iii) the role of the Designated Safeguarding Lead and his / her identity and contact details together with that of and his / her Deputy;
 - (iv) child protection training in accordance Gloucestershire Safeguarding Children Executive procedures; and
 - (v) a copy of Part 1 of Keeping children safe in education, including Annex A.
 - (vi) The Pupil Behaviour Policy
 - (vii) Cheltenham College's Whistleblowing policy

4.5.2 Child protection training

- (a) All staff including the Head will receive a copy of this policy and Part 1 of *Keeping children safe in education 2020 and Appendix A*, and will be required to confirm that they have read these.
- (b) On an annual basis all staff will receive training based on Gloucestershire Safeguarding Children's Partnership (GSCP) training. For most staff this will involve watching a video from the DSLs and answering questions on policies. For some staff it will be more appropriate to do this training in small groups.
- (c) The Head and all staff members will undertake appropriate child protection training which will be updated every 3 years following consultation with the Gloucestershire Safeguarding Children's Partnership (GSCP). Training will include guidance on the duties of staff in relation to both children in need and children at risk of harm, the risk of radicalisation and on-line safety.
- (d) Staff development training will also include training on online safety and Prevent.
- (e) The Nominated Safeguarding Council Member and the President of Council will receive appropriate training to

enable them to fulfil their safeguarding role and duties, as set out in Appendix 5.

- (f) Staff will receive regular updates concerning Safeguarding as part of the Staff Bulletin or in staff meetings.

4.5.3 **Designated Safeguarding Lead**

- (a) The Designated Safeguarding Lead and Deputy Designated Safeguarding Leads have undertaken child protection training and training in inter-agency working, and will attend refresher training at two-yearly intervals. For further details about the training of the Designated Safeguarding Lead, see Appendix 1.
- (b) All training will be carried out in accordance with GSCP procedures. Prevent duty training will be consistent with Home Office WRAP (Workshop to Raise Awareness of Prevent) training if available.

5 Procedures

5.1 Complaints of abuse

- 5.1.1 Every complaint or suspicion of abuse from within or outside Cheltenham College will be taken seriously and action taken in accordance with this policy.
- 5.1.2 The child protection training provided to staff considers the types and signs of abuse staff should be aware of. Further details are set out in Appendix 2.
- 5.1.3 If a member of staff is concerned that a pupil may be at risk of suffering serious or significant harm, the matter should be referred to the Designated Safeguarding Lead as soon as possible. If a member of staff suspects or hears a complaint of abuse, the procedures set out in Appendix 3 must be followed. See paragraph 5.3 and Appendix 4 for the procedures for dealing with allegations against staff and volunteers. If no DSL is available then please talk to a member of SLT and / or take advice from GSCP.
- 5.1.4 **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. Anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration through the GSCP escalation policy.**

5.2 Action by the Designated Safeguarding Lead

- 5.2.1 On being notified of a complaint or suspicion of abuse, the action to be taken by the Designated Safeguarding Lead will take into account:

- (a) the local inter-agency procedures of the Gloucestershire Safeguarding Children Partnership;
 - (b) where relevant, local information sharing protocols relating to Channel referrals;
 - (c) the nature and seriousness of the suspicion or complaint. A complaint involving a serious criminal offence, including the identification of someone who may already be engaged in illegal terrorist-related activity, will always be referred to children's social care and, if appropriate, the police;
 - (d) the child's wishes or feelings; and
 - (e) duties of confidentiality, so far as applicable.
- 5.2.2 If there is room for doubt as to whether a referral should be made, the Designated Safeguarding Lead will consult with the Levels of Intervention from GSCP and / or children's social care on a no names basis without identifying the family. However, as soon as sufficient concern exists that a child may be at risk of significant harm, a referral to children's social care will be made without delay (and in any event within 24 hours).
- 5.2.3 If the initial referral is made by telephone, the Designated Safeguarding Lead will confirm the referral in writing to children's social care within 24 hours. If no response or acknowledgment is received within three working days, the Designated Safeguarding Lead will contact children's social care again.
- 5.2.4 In circumstances where a pupil has not suffered and is not likely to suffer significant harm but is in need of additional support from one or more agencies, the Designated Safeguarding Lead will liaise with children's social care (Early Help team) and where appropriate an inter-agency assessment will take place, including use of the Common Assessment Framework and Team around the Child approaches, as necessary. Decisions to seek such support for a pupil will be taken in consultation with parents unless there are reasonable grounds for suspecting that in doing so, the pupil will be at risk of significant harm.
- 5.2.5 Where relevant, Cheltenham College will co-operate with the Channel panel and the police in providing any relevant information so that each can effectively carry out its functions to determine whether an individual is vulnerable to being drawn into terrorism. Cheltenham College will respond to requests for information from the police promptly and in any event within five to ten working days.

5.3 **Dealing with allegations against staff (including the DSL), Council and volunteers**

5.3.1 Cheltenham College has procedures for dealing with allegations against staff, Council 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 are set out in Appendix 4 and follow Part 4 of KCSIE.

5.3.2 The local authority has designated a particular officer, or team of officers, to be involved in the management and oversight of allegations against people that work with children (**Designated Officer(s)**). The designated officer(s) will be informed immediately and in any event within one working day of all allegations against staff, Council and volunteers that come to Cheltenham College's attention and appear to meet the criteria set out in paragraph 1 of Appendix 4.

5.3.3 **Early Years Foundation Stage (EYFS)**

(a) Cheltenham College will inform Ofsted of any allegations of serious harm or abuse by any person living, working or looking after children on the premises of the EYFS Department (whether that allegation relates to harm or abuse committed on the premises or elsewhere), and will provide details of the action taken in respect of those allegations.

(b) These notifications will be made as soon as reasonably practicable, but in any event within 14 days of the allegations being made.

5.3.4 Detailed guidance is given to staff and volunteers 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 Employment Manual, which is available on request, and includes detail of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with pupils.

5.3.5 Staff and volunteers should also feel able to follow Cheltenham College's separate Whistleblowing Policy to raise concerns about poor or unsafe safeguarding practices at Cheltenham College, potential failures by Cheltenham College or its staff to properly safeguard the welfare of pupils or other wrongdoing in the workplace that does not involve the safeguarding and welfare of children.

5.4 **Allegations against pupils**

5.4.1 All staff must be aware that abuse is abuse and it should never be tolerated or passed off as 'banter' or part of the growing up

process. Allegations against pupils should be reported in accordance with the procedures set out in this Policy. A pupil against whom an allegation of abuse has been made may be suspended from Cheltenham College during the investigation and Cheltenham College's policy on behaviour, discipline and sanctions will apply.

- 5.4.2 Cheltenham College will take advice from children's social care on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse.
- 5.4.3 If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, Cheltenham College will ensure that, subject to the advice of children's social care, the pupil's parents are informed as soon as possible and that an appropriate adult supports the pupil during the interview. In the case of pupils whose parents are abroad, the pupil's Education Guardian will be requested to provide support to the pupil and to accommodate him / her if it is necessary to suspend him / her during the investigation.
- 5.4.4 Where an allegation is made against a pupil, both the victim and the perpetrator will be treated as being at risk and safeguarding procedures in accordance with this Policy will be followed.

5.5 **Missing child and children missing from education procedures**

Missing Child

- 5.5.1 All staff are informed of the separate procedure to be used for searching for, and if necessary, reporting, any pupil missing from Cheltenham College. The procedure includes the requirement to record any incident, the action taken and the reasons given by the pupil for being missing.
- 5.5.2 Please see Cheltenham College's separate Missing Pupil Policy for further details.

Children Missing from Education

- 5.5.3 Cheltenham College shall inform the applicable local authority (within which the pupil resides when not at Cheltenham College) and Gloucestershire council of any pupil who is going to be deleted from the admission register where he /she:
- (a) has been taken out of school by his /her parents and are being educated outside the school system e.g. home education;
 - (b) has ceased to attend Cheltenham College and no longer live within reasonable distance of Cheltenham College;
 - (c) has been certified by Cheltenham College medical officer as unlikely to be in a fit state of health to attend College before

ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend Cheltenham College after ceasing to be of compulsory school age;

- (d) is in custody for a period of more than four months due to a final court order and Cheltenham College does not reasonably believe he/she will be returning at the end of that period; or,
- (e) has been permanently excluded.

5.5.4 The applicable local authority must be notified as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the register. This will assist the local authority to:

- (a) fulfil its duty to identify children of compulsory school age who are missing education; and
- (b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

5.5.5 Cheltenham College shall inform the applicable local authority of any pupil who fails to attend College regularly, or has been absent without Cheltenham College's permission for a continuous period of 10 school days or more, at such intervals as are agreed between Cheltenham College and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

5.6 Informing parents

5.6.1 Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the Designated Safeguarding Lead will need to consult the Head, the designated officer, children's social care and / or the police before discussing details with parents.

5.6.2 In relation to Channel referrals, the Designated Safeguarding Lead will consider seeking the consent of the pupil (or their parent/guardian) when determining what information can be shared. Whether or not consent is sought will be dependent on the circumstances of the case but may relate to issues such as the health of the individual, law enforcement or protection of the public.

5.6.3 See also section 3 of Appendix 4 for details about the disclosure of information where an allegation has been made against a member of staff, volunteer or the Head of Cheltenham College.

6 Secure College premises

6.1 Cheltenham College will take all practicable steps to ensure that College premises are as secure as circumstances permit.

- 6.2 Cheltenham College keeps a visitors' record at Reception. All visitors must sign in on arrival and sign out on departure and are escorted whilst on College premises by a member of staff or appropriately vetted volunteer. All visitors will be given a name badge which must be clearly displayed and worn at all times whilst on Cheltenham College premises.
- 6.3 All visitors to the boarding houses must report to a member of staff immediately on arrival, and must observe the necessity to be kept under sufficient staff supervision during their visit.
- 6.4 Cheltenham College's policy on the use of mobile phones and cameras in Cheltenham College, including the EYFS setting, is set out in the Staff ICT Acceptable Usage Policy. This policy applies to all staff in College, Prep and Pre-Prep. In the EYFS setting, neither staff nor pupils are permitted to bring mobile phones or any mobile device with a camera facility into the area.
- 6.4.1 Parents may bring mobile phones onto the premises but may only take photographs during events such as plays, concerts or sporting events for personal use. Parents should be reminded that the publications of such images (including on personal social networking sites even where access to the image may be limited) may be unlawful.

Pupils in College may carry mobile phones with them during the school day but these should only be used with the express permission of a member of staff. Boarders in 3rd -5th form will be required to hand in their phones over night to ensure pupils cannot use 3G or 4G networks. Pupils in Upper College are allowed to keep phones with them, but they will be removed if house staff feel they are being used inappropriately. (See Mobile phone Guidance). Pupils in Cheltenham Prep are not allowed to have mobile phones with them during the day, and boarders may only access them at specific times.

7 Confidentiality and information sharing

- 7.1 Cheltenham College will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. Cheltenham College will co-operate with police and children's social care to ensure that all relevant information is shared for the purposes of child protection investigations under section 47 of the Children Act 1989 in accordance with the requirements of *Working Together to Safeguard Children* (July 2018), the Prevent Duty Guidance for England and Wales (2015) and Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015).
- 7.2 Where allegations have been made against staff, Cheltenham College will consult with the Designated Officer and, where appropriate, the police and children's social care to agree the information that should be disclosed and to whom.

8 Monitoring and review

- 8.1 The Designated Safeguarding Lead will ensure that the procedures set out in this Policy and the implementation of these procedures are updated and reviewed regularly, working with Council as necessary. The Designated Safeguarding Leads will update their respective Senior Leadership Teams at least once per term on the operation of Cheltenham College's safeguarding arrangements.

Any child protection incidents or near misses at Cheltenham College may be followed by a review of these procedures by one of the the Designated Safeguarding Leads and the Council Nominated Member. A report will be made made to Council Welfare and Safeguarding Committee. Any of the DSL team, the Head or the Council Nominated Member may instigate a review. Where an incident involves a member of staff, the designated officer will assist in this review to determine whether any improvements can be made to Cheltenham College's procedures. Any deficiencies or weaknesses in regard to child protection arrangements at any time will be remedied without delay.

The DSL teams will review cases on a termly basis to ensure any lessons from cases in that term can be learnt quickly.

In addition, the Designated Safeguarding Lead will undertake an annual review of this Policy and Cheltenham College's safeguarding procedures, including the effectiveness of inter-agency working. The outcome of this annual review will be reported to Cheltenham College Council. Cheltenham College Council will review this Policy and the implementation of its procedures and consider the proposed amendments to the Policy, from both the Designated Safeguarding Lead and its own members, before giving the revised Policy its final approval. Detailed minutes recording the review by Cheltenham College Council will be made.

Most recently approved by Council: 28 November 2020.

Reviewed: OAJ 6 July 2021. Next review July 2022

Appendix 1 The Designated Safeguarding Lead and Deputies

1 In accordance with Annex B of KCSIE, the main responsibilities of the Designated Safeguarding Lead are:

1.1 Managing referrals

- (a) To take lead responsibility for referring all cases of suspected abuse of any pupil at Cheltenham College to children's social care and:
 - (i) the designated officer for all child protection concerns which involve a member of staff or volunteer;
 - (ii) the Disclosure and Barring Service (DBS) where a member of staff is dismissed or has left due to risk / harm to a child; and / or
 - (iii) the police where a crime may have been committed.
- (b) Liaising with the Head to inform him or her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- (c) To report matters of professional misconduct to NCTL as necessary
- (d) To act as the lead on Digital Health matters and ensure pupils and staff are safeguarded online.
- (e) To act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

1.2 Raising awareness

- (a) DSLs should help promote the educational outcomes of the children in the care of the school by sharing information about welfare, safeguarding and child protection issues that are experiencing or have experienced with teachers and school leadership staff.
- (b) Ensure this Policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with Cheltenham College Council regarding this.
- (c) Ensure this Policy is available publicly.
- (d) Ensure that parents are aware that referrals about suspected abuse or neglect may be made to children's social care and Cheltenham College's role in this.

- (e) Maintain links with the Gloucestershire Safeguarding Children Partnership to ensure staff are aware of training opportunities and the local policies on safeguarding.
 - (f) Where children leave Cheltenham College ensure their child protection file is copied for any new school or college as soon as possible. This will be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt will be obtained.
 - (g) In accordance with the Prevent Duty Guidance for England and Wales and Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015) the Designated Safeguarding Lead has, in addition, the following responsibilities:
 - (h) Acting as the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies in all matters relating to the Prevent duty;
 - (i) Co-ordinating Prevent duty procedures in Cheltenham College;
 - (j) Liaising with local Prevent co-ordinators, the police and local authorities and through existing multi-agency forums, including referrals to the Channel Police Practitioner and/or the police where indicated;
 - (k) Undergoing WRAP or other appropriate training;
 - (l) Maintaining ongoing training programme for all College employees including induction training for all new employees and keeping records of staff training; and
 - (m) Monitoring the keeping, confidentiality and storage of records in relation to the Prevent duty.
 - (n) Have knowledge and awareness of the Relationship and Sex Education (RSE) curriculum and the potential safeguarding issues that may arise from this.
- 2 The Deputy Designated Safeguarding Leads will carry out this role where the Designated Safeguarding Lead is unavailable.
- 3 The Designated Safeguarding Lead and the Deputy Designated Safeguarding Leads have undertaken child protection training and training in inter-agency working, and will attend refresher training at two-yearly intervals in order to:
- 3.1 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;

- 3.2 have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- 3.3 ensure each member of staff has access to and understands Cheltenham College's child protection policy and procedures, especially new and part time staff;
- 3.4 be alert to the specific needs of children in need, those with special educational needs and young carers;
- 3.5 be able to keep detailed, accurate, secure written records of concerns and referrals;
- 3.6 understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation.
- 3.7 understand the importance of information sharing, both within the school and college, and with the three safeguarding partners, other agencies, organisations and practitioners.
- 3.8 are able to keep detailed, accurate, secure written records of concerns and referrals;
- 3.9 understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- 3.10 are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college
- 3.11 can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- 3.12 obtain access to resources and attend any relevant or refresher training courses; and
- 3.13 encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures that College may put in place to protect them.

Appendix 2 Types and signs of abuse

Staff should be aware that 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. It is important that all staff are clear that abuse can take place wholly online or technology may be used to facilitate offline abuse. Children may be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

Staff can use this Government advice on '[What to do if you are worried a child is being abused](#)'.

1 Types of abuse

- 1.1 Abuse is 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 (e.g. via the internet). They may be abused by an adult or adults or another child or children. Part one of KCSIE defines the following types of abuse.

1.2 Peer on peer or child on child abuse

KCSIE states 'Governing bodies and proprietors should ensure their Child Protection Policy includes procedures to minimise the risk of peer-on-peer or child-on-child abuse and sets out how allegations of such abuse will be investigated' The document also states the importance of keeping the 'voice of the child' at the heart of decision making and in determining what procedures to follow.

The purpose of this guidance is to recognise the many forms of peer-on-peer or child-on-child abuse and to include a planned and supportive response to issues that might arise in accordance with WTTKCS. All such abuse is unacceptable and will be taken seriously.

Cheltenham College is clear that abuse is abuse. Abuse should never be tolerated or passed off as 'banter' or 'just having a laugh' or 'part of the growing up process'.

Cheltenham College recognises that this guidance should be read in conjunction with:

- Keeping Children Safe in Education 2020
- Child Protection and Safeguarding Policy
- Anti-Bullying Policy
- ICT Acceptable Use Policy
- If a child tells doc

It is necessary that those who work at College and Cheltenham Prep recognise:

- What abuse is and what it can look like
- How it can be managed
- What appropriate intervention can be put in place to support the needs of the individual.
- What preventative strategies may be put in place to reduce further risk of harm.

Types of abuse

There are many types of abuse and the list is not exhaustive.

- Physical abuse
- Sexually harmful behaviour/including sexual assault
- Bullying (including cyber-bullying and prejudiced behaviour)
- Sexting/Sextortion
- Teenage relationship abuse (coercion, controlling behaviour, sexual harassment, threats insults and/or acts of physical or sexual abuse)
- Initiation / hazing rituals.

Expected action to be taken by staff:

It is vital that professionals understand that the child who is perpetrating the abuse, may themselves be at risk of harm. The perpetrator may also need to be treated as a victim and assessments should be made to conclude this. Every effort should be made to understand the environmental context of the child's life when assessing the risk posed to the child or young person. At all times, professional judgement should be used to discriminate between behaviour that is 'normal childhood developmental behaviour' and that which is abusive, dangerous and harmful to others.

Establish the facts

Deal with the situation immediately and sensitively. Think carefully about the language used and the impact of that language on the CYP (child or young person) or the parent when they become involved e.g. do not use the word 'perpetrator' as this can create a blame culture and quickly establish labels. Remain non-judgemental and reassuring. Listen and only use questions to gain clarity. Speak to all involved separately using consistent language and open questions. Make a record of the account

given as soon as possible. If the incident poses immediate risk, contact a member of the DSL team in the first instance.

What happens next?

Information gathered should be passed to a member of the DSL team through CPOMS. The DSL will consider the risk posed and if considered to reach a threshold where the CYP is at risk of significant harm or the perpetrator has caused or shown intent to cause significant harm then a referral may be made to the GSCE or the police.

Informing Parents

Unless there are safeguarding reasons why parents should not be informed and in this circumstance, appropriate advice should be sought from the police/social care, parents should be informed as soon as possible. If a young person is 'Gillick competent*' and does not wish to share the information with parents, then in particular circumstances, this must be considered but advice should be sought.

**Gillick Competent' is a term used in medical law to decide whether a child (under 16 years of age) is able to consent to his or her own medical treatment, without the need for parental permission or knowledge.*

Support:

It is Cheltenham College's responsibility to put in place preventative measures to guard against further abuse happening. Professionals must give consideration to the impact of the school when both the victim and the perpetrator are current pupils.

For the young person who has been harmed some of the following actions may be appropriate

- Support from the Student Support Services (SSS) or an appropriate Peer Mentor.
- An Priority Pupil Plan put in place.
- On – going monitoring and review at WMT meetings
- Focused work with particular cohorts of pupils
- For particularly vulnerable pupils a RA (risk assessment) may be appropriate and more flexible arrangements with regard to boarding or day to day routine may need to be considered.

For the young person who has displayed harmful behaviour

- It is necessary to why the young person has behaved in such a way. It may be that the young person is themselves experiencing abusive behaviour and in these cases one to one counselling through College SSS or an external referral may be appropriate.
- Specific support from identified services (CYPS, Early Help etc) may be necessary as may additional support from family members.

- Where specific concerns are raised as to the young person's safety, a MAR (Multi Agency Referral) form should be completed by a member of the DSL team and sent to the local safeguarding authority.
- Sanctions for the behaviour will depend on severity and circumstances and the young person will be sanctioned accordingly.
- If, as a result of the behaviour, there is a formal criminal investigation, it may not be possible for the young person to be educated on site until the investigation is concluded.

Future Support:

It is important that after the incident the young people involved continue to feel supported. Sometimes feeling of remorse or regret emerge at a much later stage than the incident. Regular reviews with the young person and some restorative justice work is advisable to prevent further harmful behaviour towards others or themselves.

Preventative Strategies:

Cheltenham College must strive to adopt a zero tolerance culture towards abusive behaviour.

As well as participating in whole staff training, staff should:

Model (model good behaviours of courtesy and respect)

Challenge (challenge behaviours that fall short)

Correct (Make it clear why that behaviour is wrong)

Protect (ensure that the CYP subjected to the abuse is safe/alright – don't just assume.)

Report (If necessary, report the behaviour to the HsM / Head of Section or if of significant concern, follow advice in this guidance and contact a member of the DSL team.)

1.3 **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.

1.4 **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 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.

- 1.5 **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 up skirting*, 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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Part 5 of KCSIE 2020 contains useful guidance on how to deal with any allegations of sexual abuse.

* Up skirting typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence and may constitute sexual harassment (see section below)

- 1.6 **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 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.
- 1.7 KCSIE acknowledges the following as specific safeguarding issues:
- 1.7.1 children missing from education
 - 1.7.2 children missing from home or care
 - 1.7.3 bullying including cyberbullying

- 1.7.4 domestic violence (including witnessing domestic abuse)
- 1.7.5 drugs
- 1.7.6 fabricated or induced illness
- 1.7.7 faith abuse
- 1.7.8 forced marriage
- 1.7.9 gangs and youth violence
- 1.7.10 gender-based violence / violence against women and girls
- 1.7.11 mental health
- 1.7.12 private fostering
- 1.7.13 preventing radicalisation (see section 3 below)
- 1.7.14 sexting
- 1.7.15 teenage relationship abuse
- 1.7.16 trafficking.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE):

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online

CSE can involve exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the

victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Female genital mutilation:

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 16-17 of the Multi-Agency Practice Guidelines. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

From 31 October 2015 it is mandatory for any instances of Female Genital Mutilation (FGM) to be reported to the police. FGM is illegal under the FGM Act 2003, and comprises of all procedures involving partial or total removal of the external female genitalia for non-medical reasons. College follows the FGM Guidance for Schools (June 2019)

- If a girl informs a member of staff that an act of FGM (however described) has been carried out on her, or where the member of staff observes physical signs on a girl appearing to show that an act of FGM has been carried out and the person has no reason to believe that the act was, or was part of, a surgical operation, then the police should be informed as soon as possible, at least by the end of the next working day.
- Gloucestershire Police should be informed by calling 101.
- If there is a risk to life or serious immediate harm, staff should report the case immediately to police, including dialling 999 if appropriate.
- Please ensure you are given a reference number for the case, and this is recorded.

As with all Child Protection issues no leading questions should be asked, and a record of the conversation should be made as soon as possible.

The DSL should be informed as soon as possible, but they would not make the report to the police.

If a girl informs a member of staff that an act of FGM has been committed to them they must not perform any examination to ascertain the validity of this statement. Any checks must be done by medical professionals.

The duty to report a disclosure to the police is a personal duty and cannot be transferred, unless you know that Cheltenham College has already made report about the same instance.

If the girl is 18 or over at the time of the disclosure staff do not need to disclose to the police but it should be reported to the DSL.

The duty applies to cases directly disclosed by the victim; if a parent, guardian, sibling or other individual discloses that a girl under 18 has had FGM, the duty does not apply and a report to the police is not mandatory. Any such disclosure should be reported to the DSL.

The DSL should inform the girl's parents / guardian that the disclosure has been made and that a report will be / has gone to the police. However, if the DSL and the member of staff whom the disclosure was made to believe that telling the child or parents or guardian about the report may result in a risk of serious harm to the child or anyone else, or of the family fleeing the country, it should not be discussed with the family. The protection of the child must be paramount at all times.

Staff should continue have regard to their wider safeguarding responsibilities once the report has been made.

Failure to comply with this duty to report FGM will be dealt with in line with the staff disciplinary procedures and for teachers this may mean referral to the TRA (Teaching Regulation Agency).

It is important to note that if a member of staff has suspicions that FGM has been carried out, or that a girl may be at risk of FGM this should be reported to the DSL who will contact GSCE.

'Up skirting'

The Voyeurism (Offences) Act 2019 criminalises the act of 'up skirting'. The Criminal Prosecution Service (CPS) defines 'up skirting' as a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission. It is not only confined to victims wearing skirts or dresses and equally applies when men or women are wearing kilts, cassocks, shorts or trousers. It is often performed in crowded public places, for example on public transport or at music festivals, which can make it difficult to notice offenders.

If a member of staff becomes aware of any incident of this nature taking place by or to a College pupil they should contact the DSL or DSL team as soon as possible.

Relationship and Sex Education (RSE)

The RSE curriculum has been created using the [Relationship and Sex Education Guidance for schools](#). This curriculum is designed to help pupils to navigate tricky issues surrounding sexual relationship and avoid being taken advantage of. Staff should be aware of any potential issues which may come out of such lessons, and should report any concerns to the DSL team through CPOMS as soon as possible.

Mental Health Issues

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, by speaking to the designated safeguarding lead or a deputy. If in any doubt staff in College should speak to the Director of Pupil Welfare about any pupil mental health concerns they have.

Teaching Online Safety

Cheltenham College has employed a Digital Character lead to help us to support pupils through the online world. Material is delivered through Thrive, Floreat and 3rd Form Computing lessons. The government guidance: [Teaching Online safety](#) has been used to help us to write this material.

2 Signs of abuse

- 2.1 Possible signs of abuse include, but are not limited to:
 - 2.1.1 the pupil says he / she has been abused or asks a question or makes a comment which gives rise to that inference
 - 2.1.2 there is no reasonable or consistent explanation for a pupil's injury, the injury is unusual in kind or location or there have been a number of injuries and there is a pattern to the injuries
 - 2.1.3 the pupil's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour, or there is a sudden or significant change in the pupil's behaviour
 - 2.1.4 the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons
 - 2.1.5 the pupil's development is delayed, the pupil loses or gains weight or there is deterioration in the pupil's general wellbeing

- 2.1.6 the pupil appears neglected, e.g. dirty, hungry, inadequately clothed
- 2.1.7 the pupil is reluctant to go home, or has been openly rejected by his / her parents or carers and
- 2.1.8 inappropriate behaviour displayed by other members of staff or any other person working with children, for example inappropriate sexual comments; excessive one to one attention beyond the requirements of their usual role or responsibilities; or inappropriate sharing of images.
- 2.2 Gloucestershire Safeguarding Children Executive can provide advice on the signs of abuse and the DfE advice *What to do if you're worried a child is being abused (2015)* provides advice in identifying child abuse. The NSPCC website is also a good source of information and advice: www.nspcc.org.uk/

3 Radicalisation and the Prevent duty

- 3.1 Cheltenham College has a legal duty to have due regard to the need to prevent people from being drawn into terrorism.
- 3.2 Cheltenham College aims to build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. Cheltenham College is committed to providing a safe space in which children, young people and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.
- 3.3 Cheltenham College has adopted the Government's definitions for the purposes of compliance with the Prevent duty:

Extremism: "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. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas"

Radicalisation: "the process by which a person comes to support terrorism and forms of extremism leading to terrorism"

Terrorism: "an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause."

- 3.4 There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing 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. Children at risk of radicalisation

may display different signs or seek to hide their views. Cheltenham College staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. In particular, outward expressions of faith, in the absence of any other indicator of vulnerability, will not be regarded as a reason to make a referral to Channel.

3.5 *Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism* (2015) notes the following:

"36. There is no single way of identifying who is likely to be vulnerable to being drawn into terrorism. Factors that may have a bearing on someone becoming vulnerable may include: peer pressure, influence from other people or via the internet, bullying, crime against them or their involvement in crime, anti-social behaviour, family tensions, race/hate crime, lack of self-esteem or identity and personal or political grievances.

51. Example indicators that an individual is engaged with an extremist group, cause or ideology include:

- spending increasing time in the company of other suspected extremists;
- changing their style of dress or personal appearance to accord with the group;
- day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause;
- loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
- possession of material or symbols associated with an extremist cause (e.g. the swastika for far-right groups);
- attempts to recruit others to the group/cause/ideology;
or
- communications with others that suggest identification with a group/cause/ideology.

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

- clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills;
- using insulting or derogatory names or labels for another group;
- speaking about the imminence of harm from the other group and the importance of action now;
- expressing attitudes that justify offending on behalf of the group, cause or ideology;

- condoning or supporting violence or harm towards others; or
- plotting or conspiring with others."

3.6 Protecting children from the risk of radicalisation is part of Cheltenham College's wider safeguarding duties, and is similar in nature to protecting children from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences.

4 Boarding Setting

- 4.1 Staff should be aware of the particular demands of life in a boarding school, particularly abuse by peers, the dangers of alcohol abuse and drug abuse and pupil relationships. All staff in boarding houses are reminded to be vigilant to ensure pupils wellbeing is safeguarded in respect of these potential dangers.
- 4.2 Boarding staff should try to make themselves aware of pupils who are in a relationship. Cheltenham College Relationship policy is clear that relationships where there is a significant age difference would be deemed as inappropriate, and HsMs would normally speak to parents about such an issue.
- 4.3 Sexual relationships between pupils should be reported to the Senior Deputy or Deputy Head (Pastoral), and will be dealt with in accordance with the Behaviour policy. Illegal sexual relationships would be referred to the relevant authorities, such as GSCE or the Police.
- 4.4 Staff should be aware of the risk of peer abuse particularly in relation to bullying issues, gender-based violence and sexting and deal with bullying in accordance with the anti-bullying policy. If there is a risk of significant harm to any pupil then that should be considered a safeguarding matter, and reported to the DSL.
- 4.5 Staff should report any concerns they have over peer-on-peer or child-on-child sexual violence or harassment to the DSL team.
- 4.6 Any suspicions should be put on CPOMS so that the DSL team have an overview of all the small pieces of evidence that show a clearer picture of the overall situation in any house or area of school.

Guidance for staff and volunteers on suspecting or hearing a complaint of abuse

1 Action staff must take

- 1.1 A member of staff or volunteer suspecting or hearing a complaint of abuse:
 - 1.1.1 must listen carefully to the child and keep an open mind. The member of staff should not take a decision as to whether or not the abuse has taken place;
 - 1.1.2 must not ask leading questions, i.e. a question which suggests its own answer;
 - 1.1.3 must reassure the child but not give a guarantee of absolute confidentiality. The member of staff should explain that they need to pass on the information in accordance with this Policy so that the correct action can be taken; and
 - 1.1.4 must keep a sufficient written record of the conversation. The record should include:
 - (a) the date and time;
 - (b) the place of the conversation; and
 - (c) the essence of what was said and done by whom and in whose presence;and must be signed by the person making it, using names and not initials.
- 1.2 The written record and all other evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be kept securely and passed on when reporting the matter in accordance with paragraph 1.3 below.
- 1.3 All suspicions or complaints of abuse must be reported to the Designated Safeguarding Lead as soon as possible, unless it is an allegation against a member of staff in which case the procedures set out in Appendix 4 should be followed.
- 1.4 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. Anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration.**
- 1.5** Staff should be mindful of abuse from one pupil or more against another pupil, or peer-on-peer abuse. Reference should be made to Cheltenham College Anti-bullying policy. A

bullying incident should be treated as a child protection concern when there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.

- 1.6 If a pupil reports sexual abuse it is essential that any victim is reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. As with any allegation of abuse staff should not promise confidentiality, should listen carefully to the victim and not ask leading questions. It will be important to ensure the victim knows that the information will be passed on to professionals who know how to deal with such cases. As always, fill in an Incident on CPOMS as soon as possible, and refer to a DSL.
- 1.7 If a member of staff is concerned about a pupil always try to speak to that pupils' Head of Section or Housemaster / Housemistress (HsM). They may ask you to speak to a DSL or to fill in an incident on CPOMS.
- 1.8 CPOMS (Child Protection Online Management System) provides a means for Heads of Section, HsMs and DSL teams to keep an eye on all issues pertaining to particular pupil.

Appendix 4 Dealing with allegations against members of staff, the Head, Council Member or volunteers

1 Cheltenham College's procedures

- 1.1 Cheltenham College's procedures for dealing with allegations made against staff will be used where the member of staff, the Head, Council or volunteer has:
 - 1.1.1 behaved in a way that has harmed a child, or may have harmed a child;
 - 1.1.2 possibly committed a criminal offence against or related to a child; or
 - 1.1.3 behaved towards a child or children in a way that indicates he or she may pose a risk of harm if he or she work regularly or closely with children.
 - 1.1.4 behaved or may have behaved in a way that indicates they may not be suitable to work with children
- 1.2 Any allegations not meeting this criteria will be dealt with in accordance with the Gloucestershire Safeguarding Children Executive procedures. Advice from the designated officer will be sought in borderline cases.
- 1.3 All such allegations must be dealt with as a priority without delay, and should be reported within one working day.
- 1.4 If a crime may have been committed, the matter will be reported to the police.
- 1.5 Allegations against a teacher who is no longer teaching and historical allegations will be referred to the LADO, and the police as directed by the LADO.
- 1.6 It is very rare for Cheltenham College to engage supply staff, but if the school did and any safeguarding concerns were raised we would investigate this matters in the same way we would for any member of staff.

2 Reporting an allegation against a member of staff (including the DSL), the Head, Council Member or volunteer

- 2.1 Where an allegation or complaint is made against any member of staff, the Designated Safeguarding Lead or a volunteer, the matter should be reported immediately to the Head, or in his /her absence to the Nominated Safeguarding Council Member. The allegation will be discussed immediately with the designated officer before further action is taken. Where an allegation or complaint is made against the Head, the matter should be reported immediately to the President of Council or the Nominated Safeguarding Council Member, without first notifying the Head. The allegation will be discussed

immediately with the designated officer before further action is taken. The President of Council will consult the Nominated Safeguarding Council Member, and vice versa.

- 2.2 Where an allegation is made against any Council Member, the matter should be reported immediately to the President of Council or the Nominated Safeguarding Council Member. The allegation will be discussed immediately with the designated officer before further action is taken. Where appropriate, the President of Council will consult the Nominated Safeguarding Council Member, and vice versa.
- 2.3 If it is not possible to report to the Head or President of Council or Nominated Safeguarding Council Member in the circumstances set out above, a report should be made immediately to the Designated Safeguarding Lead or, if he / she is unavailable, one of the Deputy Designated Safeguarding Leads. The Designated Safeguarding Lead will take action in accordance with these procedures and will as soon as possible inform the Head or, where appropriate, the President of Council and the Nominated Safeguarding Council Member.
- 2.4 The person taking action in accordance with the procedures in this Appendix is known as the "Case Manager".

3 Disclosure of information

- 3.1 The case manager will inform the accused person of the allegation as soon as possible after the designated officer has been consulted.
- 3.2 The Parents or carers of the child[ren] involved will be informed of the allegation as soon as possible if they do not already know of it. They will also be kept informed of the progress of the case, including the outcome of any disciplinary process. The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.
- 3.3 Where the Designated Officer advises that a strategy discussion is needed, or the police or children's social care need to be involved, the case manager will not inform the accused or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.
- 3.4 The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed.

4 Further action to be taken by Cheltenham College

- 4.1 A school has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone

facing an allegation. Cheltenham College will take action in accordance with Part four of *KCSIE*, and Cheltenham College's employment procedures.

- 4.2 Alternative accommodation arrangements would be made for any member of boarding staff who may be suspended pending an investigation of a child protection nature

5 Ceasing to use staff

- 5.1 If Cheltenham College ceases to use the services of a member of staff or volunteer because they are unsuitable to work with children, a settlement/compromise agreement will not be used and a referral to the Disclosure and Barring Service will be made as soon as possible if the criteria are met. Any such incidents will be followed by a review of the safeguarding procedures within Cheltenham College, with a report being presented to the Council without delay.
- 5.2 If a member of staff or volunteer tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by Cheltenham College in accordance with this policy and a referral will be made to the Disclosure and Barring Service as soon as possible if the criteria are met.
- 5.3 Where a teacher has been dismissed, or would have been dismissed had he / she not resigned, separate consideration will be given as to whether a referral to the Teaching Regulation Agency (TRA) should be made. If there was Professional misconduct a referral to TRA will be made.
- 5.4 Early Years Foundation Stage (EYFS)
 - 5.4.1 Cheltenham College will inform Ofsted of any allegations of serious harm or abuse by any person living, working or looking after children on the premises of the EYFS Department (whether that allegation relates to harm or abuse committed on the premises or elsewhere), and will provide details of the action taken in respect of those allegations.
 - 5.4.2 These notifications will be made as soon as reasonably practicable, but in any event within 14 days of the allegations being made.

6 Unfounded, false or malicious allegations

- 6.1 Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Head will consider whether to take disciplinary action in accordance with Cheltenham College's behaviour and discipline policy.
- 6.2 Where a parent has made a deliberately invented or malicious allegation the Head will consider whether to require that parent

to withdraw their child or children from Cheltenham College on the basis that they have treated Cheltenham College or a member of staff unreasonably.

- 6.3 Whether or not the person making the allegation is a pupil or a parent (or other member of the public), Cheltenham College reserves the right to contact the police to determine whether any action might be appropriate.

7 Record keeping

- 7.1 Details of allegations found to be unfounded will be removed from personnel records.
- 7.2 For all other allegations, full details will be recorded on the confidential personnel file of the person accused.
- 7.3 An allegation proven to be false, unfounded or malicious will not be referred to in employer references. In accordance with *KCSIE*, a history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious will also not be included in any reference.

Appendix 5 Role and Duties of the Nominated Safeguarding Council Member

Overview

The Council of Cheltenham College acknowledge and understand that they have collective duties and responsibilities to safeguard and promote the welfare of children and to ensure that Cheltenham College's safeguarding policies, procedures and training are effective and comply with the law at all times.

The Council is determined to promote the well-being of children within Cheltenham College's care and recognises that well-being extends beyond the protection from harm and neglect into areas such as promoting:

- Physical and mental health and emotional wellbeing.
- Social and economic wellbeing.
- Opportunities for education, training and recreation.
- Opportunities for contributing to society.

The Council has nominated one of its members to champion best safeguarding practice in Cheltenham College, supporting the Council not just to discharge its duties under legislation and guidance but to move beyond regulatory compliance. The Nominated Safeguarding Council Member will:

- Support the Council in its commitment to promote the well-being of children within Cheltenham College's care.
- Take leadership of Cheltenham College's safeguarding arrangements, liaising with external agencies where this is required.

The appointment of the Nominated Safeguarding Council Member on the terms set out below forms part of the Council's acceptance of and response to its duties, not a delegation or abrogation of them.

Statutory Guidance

Statutory guidance '*Keeping Children Safe in Education (September 2020)*' defines safeguarding and promoting the welfare of children as:

- Protecting children from maltreatment.
- Preventing impairment of children's health or development.
- Ensuring children are growing up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

Statutory guidance, '*Working Together to Safeguard Children (July 2018)*' requires a wide range of institutions, including independent schools, to have arrangements in place that reflect the importance of safeguarding and promoting the welfare of children, including:

- A clear line of accountability for the provision of services, designed to safeguard and promote the welfare of children.

- A senior board level lead to take leadership responsibility for Cheltenham College's safeguarding arrangements.
- A culture of listening to children and taking account of their wishes and feelings, both in individual decisions and the development of services.
- Clear whistleblowing procedures, suitable referenced in staff training and codes of conduct, and a culture that enables issues about safeguarding and promoting the welfare of children to be addressed.
- Arrangements, which set out clearly the processes for sharing information with other professionals and with the Local Safeguarding Children Executive.
- A designated professional lead for safeguarding.
- Appropriate supervision and support for staff, including undertaking safeguarding training.
- Clear policies in line with those from the Local Safeguarding Children Executive for dealing with allegations against people who work with children.

The '*Prevent Duty Guidance for England and Wales (July 2015)*' emphasises that the duty to have due regard to the need to prevent children from being drawn into terrorism is an aspect of safeguarding. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.

Role and Duties

The main role and duties of the Nominated Safeguarding Council Member on behalf of the Council (which retains overall responsibility) are to:

- Champion the promotion of well-being, safeguarding and child protection issues at the highest level within Cheltenham College.
- Encourage other members of Council to develop their understanding of the Council's responsibilities with regard to well-being, safeguarding and child protection and support them in the performance of these duties.
- Ensure that the Council puts in place a suitable child protection and safeguarding policy (CPS Policy) and associated procedures, which have proper regard to prevailing regulations, guidance, standards and advice.
- Be familiar with the Local Safeguarding Children Executive guidance and procedures relating to safeguarding and child protection and associated issues, contributing to inter-agency working.
- Contribute to ensuring any deficiencies in Cheltenham College's safeguarding practices brought to Council's attention from any source are investigated and addressed.
- Meet regularly with Cheltenham College's Designated Safeguarding Lead in order to monitor the effectiveness of Cheltenham College's CPS Policy and procedures and the implementation of these across the school. It is recommended that this is at least a termly meeting.

- Ensure that the Council receives a report on the implementation of Cheltenham College's CPS Policy and procedures to support the full Council's review of the safeguarding at the school at least annually (or earlier if needed in response to changes to the law, policy or statutory guidance or as appropriate in response to specific incidents) in accordance with all statutory guidance and guidelines adopted by the Council.
- Alert the Council to any incident, which the Nominated Safeguarding Council member regards as a substantiated safeguarding incident.
- Ensure that the Designated Safeguarding Lead is part of Cheltenham College's Senior Leadership Teams and has sufficient time and resources at his/her disposal to carry out his/her duties effectively.
- Ensure that a Deputy Designated Safeguarding Lead is identified.
- Ensure that the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead receive appropriate training at least every two years.
- Ensure that arrangements are in place for the inclusion of child protection training on Cheltenham College's procedures in an induction programme for all people working in Cheltenham College, no matter for how long, nor the status of that individual.
- Ensure safer recruitment procedures are in place and implemented with appropriate checks undertaken on all new staff and volunteers.
- Review Cheltenham College's Single Central Register on at least a termly basis, after undertaking sufficient training to be able to interrogate the register and identify potential deficiencies. It is recommended that at least one review per year is on an unannounced basis.
- Be aware of how safeguarding and child protection issues, including guidance on adjusting behaviours to reduce risks, the safer use of electronic devices, social media and the internet and advice on who to turn to for help, are properly addressed through the curriculum and schemes of work.
- Ensure that the Council carries out regular risk assessment of factors particular to Cheltenham College which have a bearing on the profile of particular well-being and safeguarding issues, such as (without limitation) historical concerns, looked after children, mental health, body image, self-harm, children missing education, radicalisation, pupils performing a caring role at home, children with special needs or learning difficulties, those for whom English is an additional language, child sexual exploitation, female genital mutilation and cyber-bullying.
- Both provide to and seek from the local authority and other relevant agencies information about how the Council's duties in respect of safeguarding and child protection have been discharged where appropriate or requested.

The identity of and contact details for the Nominated Safeguarding Council Member, together with an outline of his/her duties will be widely publicised within Cheltenham College community to ensure that pupils, parents, staff and Council members understand the purpose and importance of the role.

To the extent that the role and duties of the Nominated Safeguarding Council Member conflict with those assumed by others within Cheltenham College, including the President of Council, the Council will take all necessary action to resolve those conflicts so as to achieve clarity about respective roles and duties. This may include amendments to the CPS Policy, Cheltenham College's constitutional documents and/or other governance arrangements applicable to Cheltenham College. Each of the Nominated Safeguarding Council Member and the President of Council will undertake appropriate training in accordance with the Local Safeguarding Children Executive's recommendations to fulfil the respective role and duties.

Allegations against staff

Cheltenham College's CPS Policy sets out the detail of who is responsible for liaising with the local authority designated officer(s) in the event of allegations of abuse made against the Head, proprietor, member of Council or member of staff of Cheltenham College.

Where the Nominated Safeguarding Council Member is responsible for taking the lead in liaising with the local authority and/or other partner agencies, he/she will:

- Notify the designated officer of the local authority immediately before any action is taken.
- Ensure, with local authority support, that appropriate action is taken in accordance with agreed Local Safeguarding Children Executive procedures
- Attend initial and subsequent strategy meetings as required if other agencies are involved.
- Oversee an investigation under Cheltenham College's internal employment procedures when the other agencies' involvement is at an end or as soon as it is confirmed that this may take place.
- With the Designated Safeguarding Lead, review Cheltenham College's CPS Policy and procedures, taking advice from the designated officer of the local authority and making the necessary changes.

At the conclusion of a case in which an allegation is substantiated, the Nominated Safeguarding Council Member will conduct a review of the circumstances of the case seeking appropriate input from within and outside Cheltenham College to determine whether there are any improvements to be made to Cheltenham College's procedures or practice to help prevent similar events in the future. The Nominated Safeguarding Council Member will ensure that a full report is available for Council.

Appointment of the Nominated Safeguarding Council Member

The Nominated Safeguarding Council Member is Mark Chicken and he can be contacted in the following ways:

- By email at CPCouncil@cheltenhamcollege.org
- By telephone via the Secretary to Council on: 01242 265686

If the Nominated Safeguarding Council Member is unavailable, his/her duties will be carried out by the President of Council.

The appointment of the Nominated Safeguarding Council Member has been made by Council after full consideration of the roles and responsibilities and the qualities required by potential candidates to discharge them effectively.

Reviewed 07/2021

Date most recently approved by Council – November 2020