



Safeguarding Children and Child Protection Policy

Contents

1 Introduction	3
2 Aims.....	3
3 Responsibilities	6
i) Fundamental Principles.....	6
ii) Governing Body.....	6
iii) The Designated Safeguarding Lead.....	7
4 Definitions of Child Abuse	9
i) Physical Abuse.....	9
ii) Neglect	9
iii) Emotional Abuse	10
iv) Sexual Abuse	10
v) Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)	11
vi) Honour-based violence, including Female Genital Mutilation (FGM)	11
vii) Radicalisation	12
viii) Child missing from Education	13
ix) Serious Violence, County Lines and Gang Involvement.....	13
x) Children with special educational needs and disabilities	14
xi) Mental Health	14
5 Procedures within the School	15
i) Principles.....	15
ii) What to do if you are concerned about a child’s welfare:	16
iii) What to do if a child makes a disclosure:	16
iv) General Principles of Confidentiality	17
v) Monitoring and Record Keeping	17

vi) Referrals to Social Services (through MASH) and Early Help.....	18
vii) Child Protection Records and the Data Protection Act.....	19
viii) Supporting the Child	19
ix) Supporting Staff	20
x) ‘Whistle-blowing’	20
xi) Bullying, Peer on Peer Abuse, sexual violence and sexual harassment.....	20
• Procedures to minimise the risk of peer on peer abuse:.....	21
• How allegations of peer on peer abuse will be recorded, investigated and dealt with:	22
• How victims, perpetrators and any other child affected by peer on peer abuse will be supported:.....	22
xii) Procedures for acting when abuse by a member of staff is alleged	22
xiii) Procedures for acting when abuse by the Head is alleged	24
xiv) Procedures for acting when abuse by a volunteer is alleged	24
xv) Procedures for acting when abuse by another student is alleged	24
xvi) Private Fostering	24
xvii) Online safety	25
xviii) Safe recruitment	26
6 Confidentiality.....	26
7 Power and Position of Trust.....	27
8 Contacts	27
Appendix 1: Child Protection Summary	30
Appendix 2: Staff Code of Conduct.....	31
Appendix 3: Children Missing Education Policy	40

1 Introduction

This safeguarding children and child protection policy applies to all staff (i.e. all individuals working in or for the school, including part-time staff and volunteers, governors), and pupils (both day and boarding), in both the Prep School and the Upper School. It is recognised that additional elements apply under National Minimum Boarding Standards and these are applied by the School and reflected in its boarding policies and below. The [ISI inspection report of June 2019](#) records that all safeguarding and child protection requirements were met.

The term ‘Safeguarding’ relates to the promotion of the welfare of children, protecting them from maltreatment, preventing impairment of children’s mental and physical health or development and ensuring that children are growing up in circumstances consistent with the provision of safe and effective care. In school, members of both the teaching and support staff constantly strive to make sure our students are happy, and that they feel supported and safe. Through the delivery of consistently good teaching, promoting fundamental British values and the implementation of support mechanisms, our students become successful, confident individuals who will, in time, develop positive attitudes that will serve them throughout their lives. As individual teachers, we are aware when things are not going well for a child and it is our responsibility to ensure that any identified need is reported to the child’s tutor, Housemaster, Vice Master, or Headmaster, as appropriate. In this way, we can ensure that issues are fully discussed and the necessary guidance or referral made to support the child.

The law with respect to Child Protection covers all children under the age of 18. Students who are 18+ may decide themselves whether to report abuse to the police, but they are still supported by the school. Staff members working with children are advised to maintain an attitude of ‘it could happen here’ where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child.

We believe that Bedford School promotes the welfare, health and safety and guidance of every boy through its positive, safe and stimulating environment. We create an environment where staff feel able to raise concerns and feel supported in their safeguarding role. The School Committee of Governors and the Core Management Team accept that they are responsible for ensuring that the school has a Safeguarding Children and Child Protection Policy and procedures in place to deal with incidents, consistent with Bedford Borough [Local Safeguarding Children Board guidance](#) and with regard to [‘Working together to Safeguard Children’ \(2018\)](#) and [‘Keeping Children Safe In Education’ \(2020\)](#). This last document, referred to as KCSIE 2020, remains in force throughout the response to coronavirus (Covid-19) alongside interim DfE [guidance for full reopening of schools \(2020\)](#).

Bedford School is part of the Harpur Trust. This school’s policy should be read in conjunction with the [Harpur Trust Safeguarding Policy](#).

2 Aims

This policy aims to set out clear procedures for identifying and reporting cases of suspected or actual abuse. We aspire to reduce the risk of abuse through the teaching and pastoral support offered to all boys in our care; and to provide support for students who may have been abused.

Bedford School aims to create an ethos in which pupils feel secure and valued and are listened to and taken seriously, and where staff are aware that safeguarding and promoting the welfare of children is everyone's responsibility. Staff should consider, at all times, what is in the best interests of the child.

We are committed to:

A child-centred approach. *We recognise a child's welfare is paramount. Children are listened to and involved in decision-making and the development of safeguarding practices.*

Collective and coordinated responsibility. *We recognise that safeguarding and promoting the welfare of children is everyone's responsibility. We contribute to effective inter-agency working.*

Openness, transparency and accountability. *We ensure a clear line of accountability for discharging safeguarding responsibilities and promote transparency in the appropriate and timely recording, reporting and sharing of information. We recognise that abuse can happen in any organisation.*

A culture of continuous learning and improvement. *We actively seek opportunities to share and promote good practice across and beyond the school, and in cooperation with the Harpur Trust.*

The school aims to protect and support its pupils by –

- Ensuring we practise safe recruitment in checking the suitability of staff and volunteers to work with children;
- Developing and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse;
- Supporting pupils who have been abused in accordance with their agreed Child Protection Plan;
- Establishing a safe environment in which pupils can learn and develop, one in which children and young people feel safe, secure, valued and respected; confident to talk openly and sure of being listened to;
- Preventing pupils from gaining access to dangerous or age-inappropriate material by maintaining online filters and monitoring systems. Online safety is taught within the curriculum from a young age.

We recognise that because of the day-to-day contact with children, school staff are well placed to observe the outward signs of abuse. The school will therefore:

- Ensure pupils know that there are adults in the school whom they can approach if they are worried;
- Ensure that children are taught about safeguarding, including safety online, through teaching and learning opportunities;
- Ensure that all members of staff undergo safeguarding and child protection training at induction, that their training is regularly updated in line with advice from the Local

Safeguarding Children Board, and that they receive child protection updates at least annually;

- Include opportunities in the PSHE curriculum for pupils to develop the skills they need to recognise and stay safe from abuse;
- Recognise the expertise staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis. Opportunities will be provided for staff to contribute to and shape safeguarding arrangements and relevant school policies.

We will follow the procedures set out by the Bedfordshire Safeguarding Children Board and take account of guidance issued by the Department for Education to:

- Ensure we have a designated safeguarding lead (DSL) for child protection who has received appropriate training and support for this role;
- Ensure we have a nominated governor responsible for child protection;
- Ensure every member of staff (including temporary and supply staff and volunteers) and members of the governing body know the name of the Designated Safeguarding Lead responsible for child protection and their role;
- Ensure that the Headmaster and all staff (including part-time staff and volunteers) receive training in Child Protection which is updated at least every year and as necessary. All staff are given a copy and required to read this Safeguarding policy, as well the staff Code of Conduct in Appendix 2. Staff are also given and are required to read Part I and Annex A of 'Keeping Children Safe in Education' (2020). All new staff receive full Child Protection training as part of their Induction process, including training in preventing terrorism and extremism (i.e. 'Prevent' training), and on how to manage a report of child sexual violence and sexual harassment.
- All staff are required to attend annual training to assist them to understand and discharge their role and responsibilities as set out in 'Keeping Children Safe in Education', and to take notice of updates circulated by the DSL by email and in staff briefings throughout the year.
- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and their responsibility for referring any concerns to the Designated Safeguarding Lead;
- Ensure that parents have an understanding of the responsibility placed on the school and staff for child protection by publishing our policy on the school website;
- Develop effective links with relevant agencies and cooperate as required with their enquiries regarding child protection matters, including attendance at case conferences. The school readily communicates with local safeguarding agencies whenever an allegation or disclosure of abuse has been made;
- Keep written records of concerns about children, in accordance with the procedures section of this policy, even where there is no need to refer the matter immediately;
- Ensure all safeguarding records are kept securely, separate from the main pupil file, and in locked locations;
- Develop and then follow procedures where an allegation is made against a member of staff (including supply staff and volunteers);
- Notify social services if there is an unexplained absence of more than two days of a pupil who is subject to a Child Protection Plan. Ensure that, where a pupil subject to a Child Protection Plan leaves, their information is transferred to their new school immediately and that the child's social worker is informed.

We recognise that children who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. The school may be the only stable, secure and predictable element in the lives of children at risk. When at school their behaviour may be challenging and defiant or they may be withdrawn. The school will endeavour to support the pupil through:

- The content of the curriculum. Using the curriculum to provide opportunities for increasing self-awareness, self-esteem, assertiveness and decision making so that pupils have a range of contacts and strategies to ensure their own protection and understand the importance of protecting others;
- The school ethos which promotes a positive, supportive and secure environment and gives pupils a sense of being valued;
- Ensuring that all pupils know about the adults they can turn to if worried: Tutor, Teacher, Housemaster, Chaplain, Medical centre staff, Vice Master or the Counsellor.

The School recognises that abuse can take many forms and can come from many sources. (See Section 4 for definitions of abuse and neglect.) Allegations against members of staff, family members, members of the public and fellow pupils are all treated with equal seriousness according to the procedures outlined in this policy.

3 Responsibilities

i) Fundamental Principles

Bedford School accepts the principles that:

- Abuse, in whatever form, always constitutes serious harm to the child.
- Suspicion, belief or evidence of abuse of a child, currently or in the past, must be passed to a person in authority in order for them to seek advice and evaluate the information.

It is accepted that child abuse can be a problem for children from all backgrounds and that any child may be in need of protection. Our staff are trained in the principle that the welfare of children is everyone's responsibility. No single professional can have a full picture of a child's needs and circumstances. Everyone who comes into contact with children and their families has a role to play in identifying concerns, sharing information and taking prompt action. This policy helps staff to recognise the signs of abuse and neglect, and informs them about how and with whom to share information in order to achieve the best outcome for the child. As a general rule, all safeguarding concerns should be brought to the attention of the Vice Master and Designated Safeguarding Lead, Daniel Koch, immediately.

ii) Governing Body

The School Committee of Governors accepts their responsibility to:

- Ensure that there are policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare, including an effective safeguarding and child protection policy and staff code of conduct;
- Follow the guidelines in 'Keeping Children Safe In Education' (KCSIE), 2020;

- Ensure that all adults who have had a lapse in service of three months will be checked through the Disclosure and Barring Service;
- Review the policies and procedures for Child Protection annually to satisfy themselves that the duties outlined have been appropriately and efficiently discharged;
- Nominate a Governor to have responsibility for Child Protection. (This Governor is currently Dr Andrew Edwards.);
- Remedy any deficiencies or weaknesses in regard to Child Protection arrangements that are brought to its attention without delay.
- Ensure that staff have the skills, knowledge and understanding necessary to keep safe children who are looked after by a local authority, if and when they have such children on roll. This would include ensuring that a designated member of staff has responsibility for their welfare and progress and has up to date information from the relevant local authority, the most recent care plan and contact arrangements with parents, and delegated authority to carers.

iii) The Designated Safeguarding Lead

The Vice Master, Daniel Koch, is the Designated Safeguarding Lead. He is trained in child protection and inter-agency working and is member of the senior leadership team, known at Bedford School as the Core Management Team (CMT). Daniel Koch is the overall DSL of Bedford School, including both the Upper School and the Prep School. He takes lead responsibility for safeguarding and child protection, including online safety. The Assistant Head of the Prep School, Rachel Stratton, is also trained as a Designated Safeguarding Lead and concerns about safeguarding in the Prep School may be brought to her attention in the first instance. (Note that Mrs Stratton is currently on Maternity Leave. Mr Simon Lincoln is acting in her place, and is also fully trained). If the Designated Safeguarding Lead(s) are unavailable, the Head Master, James Hodgson, will act for Daniel Koch and the Prep School Headmaster, Ian Silk, will act for Rachel Stratton/Mr Lincoln. If the Heads are also absent, the Senior Boarding Housemaster (Chris Bury) and Senior Day Housemaster (Simon Everitt) are also trained as Deputy DSLs and will take responsibility for handling safeguarding concerns in any part of the school.

As stated in Annex B of 'Keeping Children Safe in Education' (2020), the Designated Safeguarding Lead is expected to:

- Manage referrals. This includes referring cases of suspected abuse to the local authority children's social care; supporting staff who make referrals to children's social care; referring cases to the Channel programme where there is a radicalisation concern and supporting staff who make referrals to the Channel programme; referring cases where a person is dismissed or left the school due to risk or harm to a child to the Disclosure and Barring Service; referring cases where a crime may have been committed to the Police as required.
- Work with others. This includes liaising with the Head Master to inform him of issues, especially ongoing enquires under section 47 of the Children Act 1989 and police investigations; liaising with the 'case manager' and designated officer(s) at the local authority for child protection on concerns in all cases which concern a staff member; liaising with staff on matters of safety and safeguarding, and deciding whether to make

a referral by liaising with relevant agencies or the police;¹ acting as a source of support, advice and expertise for staff.

- Undertake training to provide them with the knowledge and skills to carry out the role, including Prevent awareness training, which should be continuously updated at least every two years; refreshing knowledge and skills at regular intervals and at least annually by, for example, meeting other DSLs and carrying out reading on safeguarding developments in order to:
 - Understand the assessment process for providing early help and intervention. The DSL is familiar with '[Protecting Children: The Bedfordshire and Luton Safeguarding Children Board Procedures](#)'.
 - Have a working knowledge of how local authorities conduct a child protection case and child protection review conference and so be able to attend and contribute to these effectively when required to do so;
 - Ensure each member of staff has access to and understands the school's safeguarding and child protection policy, especially new and part-time staff;
 - Be alert to specific changes of children in need, those with special education needs and young carers. Where a child has a social worker, the DSL should liaise with them so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.
 - Be able to keep detailed, accurate, secure written records of concerns and referrals;
 - Understand and support the school with regards to the requirements of the Prevent duty and be able to provide advice and support to staff on protecting children from the risk of radicalisation;
 - Obtain access to resources and encourage a culture of listening to children and taking account of their wishes and feeling, among all staff, in the measures that the school takes to protect them.
- Raise Awareness. This includes ensuring that the school's child protection policies are known, understood and used appropriately; working with governors and ensuring that this Safeguarding and Child Protection Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly; ensuring the policy is available publicly and parents are aware that referrals about suspected abuse or neglect may be made and the role of the school in this; linking with the local LCSB to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- Child protection file. The DSL ensures that where children leave the school, their child protection file is transferred to the new school or college as soon as possible, separately from the main pupil file, ensuring secure transit and confirmation of receipt.
- The DSL should be available for staff to discuss any safeguarding concerns in person within the school day; if he is unavailable, he will ensure that Rachel Stratton/Simon Lincoln, Ian Silk, James Hodgson or the Senior Boarding and/or Day Housemaster is available until his return.

In addition, the DSL will:

- Keep written records of concerns about a child, even if there is no need to make immediate referral.

¹ See KCSIE 2020, paragraph 70 and NSPCC Guidance [When to Call the Police](#).

- Ensure that all such records are kept confidentially and securely and are separate from pupil records.
- Monitor the attendance of any pupil currently deemed to be at risk and refer concerns, when appropriate, to the Bedford Borough Council [Education Welfare Service](#) in the first instance.

4 Definitions of Child Abuse

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. A child may be abused by an adult or adults or another child or children. They may be abused in a family or in an institutional setting by those known to them, or more rarely, by others (e.g. via the internet). Abuse can take place wholly online and technology may be used to facilitate off-line abuse. This section provides broad definitions of different categories of abuse, possible signs of abuse and their impact. Although these categories are useful, the types and indicators of abuse often overlap with each other. Staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label.

i) Physical Abuse

Physical abuse is 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.

- Possible signs: Bruising (without satisfactory explanation), burns (often recurrent), bite marks, parent/carers frequently alleging illness in a child, body covered in hot weather, reluctance to do PE or shower, self-harm.
- Impact of physical abuse: It can lead to neurological damage, physical injuries, disability and occasionally death. Harm may be caused directly by the abuse itself or by the abuse taking place in a wider family context of conflict. Physical abuse has been linked to aggressive behaviour, emotional and behavioural problems and educational difficulties.

In making professional judgements, take into account: The frequency of bruising/injury, context of injury, explanation from child and adult, parent response. 'Non-Accidental Injuries' may need to be followed up too. If injuries keep occurring, issues of neglect and level of supervision need to be discussed with appropriate agencies.

ii) Neglect

Neglect is 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.

- Possible signs of neglect: Constant hunger, poor personal hygiene, poor state of clothing, frequent lateness or non-attendance at school, untreated medical problems.
- Impact of neglect: Severe neglect of young children is associated with major impairment of growth and intellectual development. Persistent neglect can lead to serious impairment of health and development, and long-term difficulties with social functioning, relationships and educational progress.

iii) Emotional Abuse

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

- Possible signs of emotional abuse: Physical, mental and emotional development lags, over-reaction to mistakes, extremes of passivity or aggression, continual self-deprecation, self-harm, inappropriate emotional response to painful situations. It may be when an adult constantly behaves in an uncaring or hostile way towards a child or young person, perhaps by bullying, rejecting, frightening or criticising them.
- Impact of emotional abuse: Emotional abuse has an important impact on a developing child's mental health, behaviour and self-esteem. It can be especially damaging in infancy. Domestic violence, adult mental health problems and parental substance misuse may be features in families where children are exposed to such abuse.

iv) Sexual Abuse

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 (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. Sexual abuse of children by other children is a form of peer-on-peer abuse which is dealt with further in section xi of this policy.

- Possible signs of sexual abuse: Children displaying knowledge or interest in sexual acts inappropriate to their age; children using sexual language or have sexual knowledge that you wouldn't expect them to have; children asking others to behave sexually or play sexual games; children with physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy.
- Impact of sexual abuse: Victims of sexual abuse may self-harm, demonstrate inappropriate sexualised behaviour, suffer with depression, and loss of or a poor self-esteem. They may show aggressive behaviour, lack of trust, or run away from home.

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

Child sexual exploitation (CSE) is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.² If the child is coerced, manipulated or deceived into criminal activity, it is known as Child Criminal Exploitation (CCE).

CSE and CCE 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 or criminal activities. CSE is a form of sexual abuse and consent cannot be given. Child sexual exploitation is never the victim's fault, even if there is some form of exchange. 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.

vi) Honour-based violence, including Female Genital Mutilation (FGM)

So-called 'honour-based' violence (HBV) 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. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Staff should

² Department for Education, [Child Sexual Exploitation](#), February 2017.

always bring concerns to the DSL immediately. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

Female Genital Mutilation (FGM): professionals in all agencies, and individuals and groups in relevant communities (including boys' schools), need to be alert to the possibility children being at risk of FGM, or already having suffered FGM. For example, if a boy discloses knowledge or concern about FGM in their family or community, it is important for staff to know how to respond.

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 practice FGM. 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. Where a member of staff discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there is a statutory duty upon that individual to report it to the police. Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. They should also discuss any such case with the school's DSL and involve children's social care as appropriate. In cases relating to girls over the age of 18 or if a member of staff suspects that FGM has been carried out, they should discuss their concerns with the DSL who should involve children's social care as appropriate.

vii) Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

Section 26 of the Counter-Terrorism and Security Act, which received Royal Assent on 12 February 2015, places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism ("the [Prevent duty](#)"). Bedford School has regard to government statutory [Prevent duty guidance for England and Wales](#) (revised July 2015), and in particular Paragraphs 57-76, which are concerned specifically with schools and childcare providers.³

The Act also places a duty on local authorities to ensure Channel panels are in place. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Following a referral, the panel will assess the extent to which identified individuals are vulnerable to being drawn into terrorism, and, where considered appropriate and necessary consent is obtained, arrange for support to be provided to those individuals. Referral to the Channel programme will be undertaken by the DSL, but may also be undertaken directly by a member of staff. The Act

³ *Prevent* is supplemented by non-statutory advice and a briefing note: [The Prevent duty: Departmental advice for schools and childminders](#) (June 2015) and [The use of social media for on-line radicalisation](#) (July 2015)

requires partners of Channel panels, such as schools, to co-operate with the panel in the carrying out of its functions and with the police in undertaking the initial assessment as to whether a referral is appropriate.

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. Signs that could suggest radicalisation can include a withdrawal of isolation from former friendship groups, use of symbols or insignias, or use of radical or extremist language, or seemingly 'scripted' language. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. It should include a discussion with the Designated Safeguarding Lead (Daniel Koch) and may result in making a referral to the Channel programme (prevent@bedfordshire.pnn.police.uk or 01582 473080).

The DSL has undertaken Prevent awareness training and is able to provide advice and support to other members of staff on protecting children from the risk of radicalisation. The school accepts that effective engagement with parents or the family of the child should also be considered as they are in a key position to spot signs of radicalisation. The school would attempt to discuss any concerns in relation to possible radicalisation with a child's parents in line with LSCB advice, unless they have specific reason to believe that to do so would put the child at risk.

The Prevent duty stipulates that visiting speakers, whether invited by staff or by pupils, are suitable and appropriately supervised. All staff and pupils inviting speakers into the school should contact the Vice Master, or the Assistant Head in the Prep School, providing the name of the speaker, the purpose of their visit, the time and date of their visit, and supervision arrangements in place.

viii) [Child missing from Education](#)

All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. A child going missing from education is a potential indicator of abuse or neglect. The school works with the local authority to fulfil responsibilities set out in '[Children Missing Education](#)' (Sept. 2016). All schools must inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more, but may report earlier. Staff must refer all concerns about a pupil's attendance to the DSL. The school's full Children Missing Education Policy is set out below in this policy as Appendix 3.

The school also has a [Missing Child Procedure](#) which staff should refer to and follow in all cases of a child's unauthorised absence.

ix) [Serious Violence, County Lines and Gang Involvement](#)

Children are at risk of involvement, or being victimised by, gun, gang and knife crime. 'County Lines' is when gangs (usually from urban areas) exploit children and use them to transport or sell drugs in smaller towns – often by enticing/paying them (initially) or manipulating/coercing them. They target the most vulnerable young people, and also children who might have access to more affluent clientele. Staff should be aware of the signs

that a young person may be at risk and report any concerns immediately to the Designated Safeguarding Lead immediately. Indicators may include increased absence from school, a change in friendship groups, significant decline in performance, signs of self-harm, assault or unexplained injuries, possessing unexplained gifts or money. Other signs may include:

- Changes in emotional well-being, behavior and attitude
- A person meeting unfamiliar adults
- The use of drugs and alcohol
- Individuals with multiple mobile phones, tablets or 'SIM cards'
- Relationships with controlling or older individuals
- Possession of weapons, drugs or paraphernalia

Further government guidance for schools can be found in [Criminal Exploitation of Children and Vulnerable Adults: County Lines \(2017\)](#) and [Advice to Schools and Colleges on Gangs and Youth Violence \(2013\)](#).

x) Children with special educational needs and disabilities

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children. This can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- children with SEN and disabilities can be disproportionately impacted by things like bullying-without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers. This can also apply to boys who speak English as an Additional Language, and may not have developed the vocabulary or confidence to make a disclosure.

Staff must consult the school's SEN and EAL registers and be particularly aware of students' individual needs, bearing these in mind when carrying out their responsibilities to be attentive to the signs of abuse and neglect; or in responding in the event of a disclosure.

xi) Mental Health

There is a link between mental health and safeguarding. Schools play an important role in detecting possible problems and supporting good mental wellbeing. It is part of our safeguarding responsibility to prevent impairment of children's mental as well as physical health and development.

All staff should be aware that mental health problems can, in some cases, be an indication of abuse, neglect or exploitation. Only appropriately trained professionals should diagnose mental health problems. However, school staff are well placed to identify behaviour which may indicate that a child is experiencing mental health problems or is at risk of developing one. Staff should immediately raise any mental health concerns with the Designated Safeguarding Lead (DSL) or deputy.

Staff must be aware of how adverse experiences, like abuse and neglect, can have a lasting impact on a child's mental health, behaviour and education. DfE guidance [Mental Health and Behaviour in Schools](#) (2018) sets out best practice in promoting children and young people's emotional health and wellbeing.

All staff should recognise the school's role in supporting pupils' mental health. Particularly in the current situation around COVID-19, staff should be aware that some pupils will find circumstances particularly challenging. Some pupils may experience high or acute anxiety. Some signs to be aware of include: preoccupation and excessive worry, emotional and behavioural changes, showing signs of not being able to cope, avoidance of responsibilities or relationships, repetitive thoughts, or chronically thinking about risk and threat, rumination or thinking too deeply about the situation. As pupils are welcomed back into the school in September 2020, staff should be aware that boys' mental health will have been impacted.

Other signs of mental health problems may be seen in a child's emotional state (fearful, withdrawn, low self-esteem); behaviour (aggressive or oppositional; habitual body rocking); interpersonal behaviours (indiscriminate contact or affection seeking, overfriendliness or excessive clinginess; demonstrating excessively 'good' behaviour to prevent disapproval; failing to seek or accept appropriate comfort or affection from an appropriate person when significantly distressed; coercive controlling behaviour; or lack of ability to understand and recognise emotions).

Whenever staff have concerns about a child's mental health or behaviour, these should be referred to the DSL in the same way as any other potential safeguarding concern, ideally with the boy's tutor and Housemaster also copied. When the school suspects that a pupil is having mental health difficulties, it will put support in place, and may seek or recommend specialist support in managing mental health problems, for example via external agencies or services such as the [School Nursing Service](#).

5 Procedures within the School

i) Principles

The staff summary sheet (Appendix I) issued to staff at the beginning of each academic year provides a quick reference for dealing with a case of abuse. Our school procedures for safeguarding children will be in line with Local Safeguarding Children Board guidance, 'Working together to Safeguard Children' (March 2015), and 'Keeping Children Safe in Education' (2020).

We will ensure that:

- All new members of staff including supply staff, part-time and voluntary staff who work with children will be given a copy of the summary sheet and a copy of Part I and Annex A of 'Keeping Children Safe in Education' (2020) as part of their induction. Training for new staff will take place during the first term of entry to the school.
- Our procedures will be reviewed and updated annually, and staff will receive updated safeguarding training at least once per academic year.
- We have a trained Designated Safeguarding Lead (see section 3.iii above) who undertakes refresher training regularly and in line with government guidance.

- All staff (including teaching and support staff) are familiar with Child Protection procedures and that they know that all cases of child abuse or suspected child abuse should be reported immediately to the DSL. He has responsibility for referring suspected child abuse cases to Social Services within 24 hours.
- All parents and carers may obtain a copy of the Safeguarding and Child Protection policy from the school website. All parents and carers therefore know the identity of the DSL.

The following points are instructions for staff:

ii) What to do if you are concerned about a child's welfare:

- Even if unsure always discuss your concerns with the DSL, Daniel Koch. In the Prep School, Rachel Stratton (and during her current maternity Leave, Simon Lincoln) is trained as a DSL and concerns may be brought to her. If the Designated Safeguarding Lead(s) are unavailable, the Head Master, James Hodgson, will act for Daniel Koch and the Prep School Headmaster, Ian Silk, will act for Rachel Stratton/Simon Lincoln. If the Heads are also absent, the Senior Boarding Housemaster (Chris Bury) and Senior Day Housemaster (Simon Everitt) are also trained as DSLs and will take responsibility for handling safeguarding concerns in any part of the school.
- Put your concerns in writing, taking particular notes of times, dates, any relevant factual information, and wherever possible, the exact words of the child, and pass to the DSL. We do not require a form to be filled in. Your records can be handwritten, typed or emailed. Be thorough and factual. Pass the information on as quickly as possible.
- 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. The DSL will normally make this referral, but anybody can make a referral (see Section 5.vi below). If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration.
- It is important for children to receive the right help at the right time to address risks and prevent issues escalating. Research and Serious Case Reviews have repeatedly shown the dangers of failing to take effective action. Poor practice includes: failing to act on and refer the early signs of abuse and neglect, poor record keeping, failing to listen to the views of the child, failing to re-assess concerns when situations do not improve, sharing information too slowly and a lack of challenge to those who appear not to be taking action.

iii) What to do if a child makes a disclosure:

- A disclosure may happen at any time.
- If you talk to a child, do so with tact and sympathy. Listen, but do not offer an opinion.
- Do not ask leading questions. When asking questions always ask open questions using the TED principle of Tell me, Explain to me, Describe to me.
- Do not let the child take the blame. A child cannot be held responsible for abuse.
- Make careful and detailed legible notes. Record the date, event, observation, disclosure (recording the exact words used as closely as possible), and action taken.
- Pass the information and a written account to the DSL immediately.

- The DSL will either seek guidance from the LADO (Local Authority Designated Officer) or contact Social Services. He will decide whether it is appropriate to contact parents. Do not contact parents yourself.
- Confidentiality should not be promised; make clear that staff have a responsibility to share relevant information with the DSL. It is important to remind the child that you will have to pass on their concern.
- Do not panic and think things have to happen instantly. It is more important that the right decision is made and therefore immediate referral to the DSL is essential.

iv) General Principles of Confidentiality

- All staff should be aware that personal information about a child and their family is confidential and should only be given to an appropriate person.
- If abuse is suspected, accurate information must be given to the DSL immediately.
- Other teachers need only know enough to prepare them to act with sensitivity to a distressed child.
- If a child makes a disclosure, the child should be kept informed of who knows and why.
- Promises of confidentiality must not be given as a teacher has a duty to protect a child from abuse; all abuse must be reported.
- Staff should not, in any circumstances, remove a child's clothing. They should only note those marks which they have noticed or which are brought to their attention by the child.
- No further examination should be carried out.
- Teachers should not photograph the injury.
- All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

If staff (teaching or support) hear worrying information about children from parents, neighbours or even other children, this should be passed on to the DSL.

v) Monitoring and Record Keeping

The School can play a vital role in helping children and those who are suspected of being abused, by monitoring and recording certain aspects of the child's progress and behaviour in school.

All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements staff should discuss with the DSL. Evidence from reports and reviews into the deaths of children indicate the vital importance of record keeping as indicated in the 'Working together to safeguard children – a guide to interagency working to safeguard and promote the welfare of children' (March 2015). A chronology sheet will be used to make a written record of Child Protection activities and concerns.

All staff are responsible for passing the following information to the DSL(s):

- Patterns of attendance
- Changes in mood
- Changes in classroom functioning
- Relationships (with peers and adults)
- Behaviour

- Statements made by the child, comments, stories, ‘news’, drawings
- General demeanour and appearance
- Home/family changes
- Medicals
- Response to PE/Sport
- Injuries/marks – past and present

The DSL will decide when to start and finish monitoring the child and decide upon further action to be taken.

vi) Referrals to Social Services (through MASH) and Early Help

When the School makes a referral, the school will consider whether the child is in need of urgent protection. If the child is in immediate danger or is at risk of harm, the school will make a referral to children’s social services and/or the police immediately.⁴ In Bedford Borough, it will follow [recommended procedures](#) for contacting the Multi Agency Support Hub (MASH) on 01234 718700, or by email Multiagency@bedford.gov.uk. For emergencies outside of working hours the school will contact The Emergency Duty Team (EDT) 03003008123, or call 999 or the police as appropriate.

Where there is concern, but not immediate danger, the school will consider the option of applying for Early Help. Early Help means providing support as soon as a problem emerges at any point in a child’s life. In practice this could mean enrolment of the child or family in services focusing on inclusion, education welfare or positive parenting. Bedford Borough offers wide-ranging [Early Help](#) services. Staff should, in particular, be alert to the potential need for early help for a child who: is disabled and has specific additional needs; has special educational needs; is a young carer; is showing signs of engaging in anti-social or criminal behaviour; is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems and domestic violence; has returned home to their family from care; and/or is showing early signs of abuse and/or neglect.

For a referral for Early Help or Support, the school will use the Bedford Borough EHA (Early Help Assessment) and email it to Bedford Borough MASH using the address above. For an early help assessment to be effective, the assessment should be undertaken with the agreement of the child and their parents or carers. The school will arrange a meeting with the parents or carers prior to submitting the EHA. If parents and/or the child do not consent to an early help assessment, then the lead professional (usually the DSL) should make a judgement as to whether, without help, the needs of the child will escalate. If so, a referral into local authority children’s social care may be necessary. Although we will in most cases notify parents that we are making or have made a referral, it is important to note that parental consent is not required for referrals to statutory agencies.

Before making any referral, staff should discuss safeguarding concerns about a child with the DSL. In most circumstances, the DSL will make the referral. Any member of staff can make a referral, though they should not do so without having discussed the matter with the DSL first,

⁴ This would include any child whose needs may meet the threshold for statutory intervention under the Children Act 1989 such as those considered to be ‘[in need](#)’ for the purposes of the Act, those who may be suffering, or are likely to suffer, significant harm, and/or those who may be in immediate danger and in need of immediate protection.

or, if they do make the referral before speaking to the DSL, they should inform the DSL as soon as possible thereafter.

When the DSL, or any member of staff, refers a child for Early Help, they should include any information they have on the child's developmental needs and the capacity of the child's parents or carers to meet those needs. This information may be included in any assessment, including the early help assessment, which may have been carried out prior to a referral into local authority children's social care. Where an early help assessment has already been undertaken it should be used to support a referral to local authority children's social care, however, this is not a prerequisite for making a referral.

The LSCB (Local Safeguarding Children Board) uses referral [thresholds](#) to determine how they will respond to the referral. They should decide within one working day what actions should be taken.

When referring, anything said by the child should be written down as a verbatim report. Information will be recorded in factual, non- emotive, non-judgmental terms, with notes of the time, date and context of the events in question. A reference will be made on the child's file. The file will be kept centrally and confidentiality will be respected. Child Protection records will be kept securely locked. A reference should be made on a child's school file that a Child Protection File exists. When the child transfers to a new school, the Child Protection File will be forwarded to the receiving school.

vii) [Child Protection Records and the Data Protection Act](#)

Fears about sharing information cannot be allowed to stand in the way of the need to promote the safety and welfare of children. The General Data Protection Regulation (GDPR) and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe.⁵ We recognise the importance of sharing information with local agencies. Child Protection records can be kept on computer and are exempt from the disclosure provisions of the Data Protection Act. All staff should understand that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data without consent when there is a good reason to do so.

For manual records the Education (School Records) Regulations 1989 exempt information relating to child abuse from the requirement of disclosure. However, in cases of alleged child abuse which come to court, the court may require the School to provide its Child Protection records.

viii) [Supporting the Child](#)

If abuse is suspected, full, accurate information will be given to the DSL. The School accepts that other staff need know only enough to prepare them to act with sensitivity to a distressed child. The school will provide appropriate support to a child who has been or may have been abused or neglected, which may include arranging time with the counsellor, chaplain, or other services in school; or implementing measures suggested by the LSCB.

⁵ See KCSIE (2020), paragraphs 84-88. Also see [Information Sharing: advice for practitioners](#) (2018) and DfE [Data Protection: Toolkit for Schools](#) (2018).

ix) Supporting Staff

We accept that staff working in school who have become involved with a child who has suffered harm or appears to be likely to suffer harm may find the situation stressful and upsetting. We will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support.

x) 'Whistle-blowing'

The School provides an environment in which children and adults feel confident to express concerns regarding the behaviour of a member of staff. It aims to create a culture of safety and sharing concerns, valuing staff and of reflective practice. Whistle-blowing is the mechanism by which staff can voice their concerns, made in good faith, without fear or repercussion. Staff should acknowledge their individual responsibilities to bring matters of concern to the attention of the DSL, the Core Management Team, the Chairman of Governors and/or relevant external agencies. This is particularly important where the welfare of children may be at risk. There are procedures for reporting concerns, including about poor or unsafe practice and potential failures in the school's safeguarding regime in section 3.xii below. Staff should also refer to the Harpur Trust [Whistleblowing Policy](#).

If a staff member feels unable to raise a safeguarding issue within the school, or that their genuine concerns are not being addressed, other whistleblowing channels are open to them. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285. The line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk.

xi) Bullying, Peer on Peer Abuse, sexual violence and sexual harassment

All staff should be aware that children are capable of abusing their peers. This is most likely to include, but not limited to: bullying (including cyber-bullying), gender based violence/sexual violence, sexual harassment, physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm), initiation or hazing-type rituals and sexting (youth-produced sexual imagery).⁶ We believe adopting a contextual approach to safeguarding, recognising that children are vulnerable to abuse in a range of social contexts, including amongst their peers in school and out of school, and in spaces where their parents or guardians may have little influence.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school, and can occur between children outside of the school environment. All staff, but especially the Designated Safeguarding Lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

⁶ KCSIE 2020, paragraph 29.

Abuse between young people is abuse and should never be tolerated or passed as mere 'banter', 'having a laugh' or 'part of growing up'. Staff should be clear as to the school's policy and procedures with regards to peer on peer abuse.

Bullying is one form that peer on peer abuse can take. Our policies on anti-bullying anti-cyber-bullying are set out in a separate policy document. We acknowledge that bullying and cyber-bullying are serious safeguarding issues. Our Anti-Bullying and Anti-Cyberbullying Policy sets out how the school deals with allegations of bullying, including how victims will be supported, and how sexting is dealt with. Sexting is when someone sends or receives a sexually explicit text, image or video. This includes sending 'nude pics', 'rude pics' or 'nude selfies'. Pressuring someone into sending a nude pic can happen in any relationship and to anyone, whatever their age, gender or sexual preference. Staff who become aware of sexting or youth-produced sexual imagery should be aware of [Searching, Screening and Confiscation Advice](#) (January 2018) and [UKCCIS sexting advice](#) (for schools and colleges). 'Upskirting', the act of taking a picture underneath someone else's clothing, is a criminal offence under the Voyeurism (Offence) Act 2019. The key consideration is for staff not to view or forward illegal images of a child. The highlighted advice provides more details on what to do when viewing an image is unavoidable.

There are many other forms of peer on peer abuse. 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. Sexual violence refers to acts of rape, assault by penetration or sexual assault. Sexual harassment refers to unwanted conduct of a sexual nature that can occur online and offline. This may include sexual comments, sexual 'jokes', or physical behavior. Some children are particularly vulnerable to physical, sexual and emotional abuse by their peers, including students with SEN and/or disabilities.

The school recognises the gendered nature of some forms of peer on peer abuse. It is more likely that girls will be victims and boys perpetrators. Although the school is an all-boys environment, we recognise that our boys could be the perpetrators or the victims of peer-on-peer abuse involving girls as well as other boys. We educate our boys in how to behave responsibly with all peers, male and female, with particular emphasis in our PSHE programme on issues such as consent.⁷ All peer on peer abuse is unacceptable and will be taken seriously.

- [Procedures to minimise the risk of peer on peer abuse:](#)

The School actively seeks to raise awareness of and prevent all forms of peer-on-peer abuse by training all staff and volunteers on the nature, prevalence and effect of peer-on-peer abuse, and how to prevent, identify and respond to it. We educate boys about the nature and prevalence of peer-on-peer abuse via PSHE and the wider curriculum. They are regularly informed about the School's approach to such issues, including its zero tolerance policy towards all forms of peer-on-peer abuse. All peer-on-peer abuse issues are fed back to the school's safeguarding lead so that they (with other pastoral leaders) can spot and address any concerning trends and identify pupils who may be in need of additional support. We aim to challenge the attitudes that underlie such abuse by championing the school's values and applying them to moral situations, including encouraging a culture of respect amongst all

⁷ The school follows statutory guidance [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education](#) (2019).

members of the School community. Further preventative measures specific to bullying and cyberbullying are outlined in the anti-bullying policy. The Designated Safeguarding Leads of the Harpur Trust Schools meet regularly and work together to review trends and share best practice.

- How allegations of peer on peer abuse will be recorded, investigated and dealt with:

If a child discloses that they have been abused, the person taking the disclosure should follow the procedures outlined in this policy, including making a written record of the disclosure and seeking the advice of the DSL. Next steps may be supported by other agencies, such as children's social care and the police as required.

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider: the victim, especially their protection and support; the alleged perpetrator; and all the other children (and, if appropriate, adult students and staff) at the school. The school will follow the guidance laid out in the DfE's [Sexual violence and sexual harassment between children in schools and colleges](#) (May 2018) and KCSIE (2020), Section 5.

- How victims, perpetrators and any other child affected by peer on peer abuse will be supported:

In the event of disclosures about pupil on pupil abuse, all children involved, whether perpetrator or victim, are treated as being at risk. In all cases where a child has been harmed, is at risk of harm, or is in immediate danger, the school should make a referral to local children's social care, where advice will be sought regarding further action.

In supporting the victim, the pupil's age and the developmental stage, the nature of the allegations and the potential risk of further abuse will all come into consideration. The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report. Support will be tailored on a case-by-case basis.

The age and the developmental stage of the alleged perpetrator will also be considered. Any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them. The school will carefully consider the proportionality of the response. The level of support and nature of sanctions applied will be considered on a case-by-case basis

The school's main point of reference in the management of all cases of or concerns about peer on peer abuse is Keeping Children Safe in Education (2020), Section 5.

- xii) [Procedures for acting when abuse by a member of staff is alleged](#)

If an allegation is made against a member of teaching or non-teaching staff (including supply staff and volunteers), responding to it appropriately and in the timeliest manner possible must be a clear priority to the benefit of all concerned. At any stage of consideration or investigation, unnecessary delays should be avoided. The School will not undertake their own investigations of allegations without prior consultation with the Local Authority Designated Officer (LADO), or in the most serious cases, the police, so as not to jeopardise statutory investigations. In borderline cases discussions with the LADO can be held informally and without naming the school or individual.

All allegations are to be reported straight away, normally to the Head, but the DSL is designated also to receive referrals. In their absence it would be reported to the Chair of Governors who would ensure that the LADO is informed without delay. Note: any member of staff may make a referral to external agencies. Details of the LADO are given in Section 9 ('Contacts') of this policy. All action must be carefully recorded.

The discussion with the LADO will consider the nature, content and context of the allegation, and a course of action will be agreed, including any involvement of the police. Discussions should be recorded in writing, and any communication with the individual and the parents of the child will be agreed. Consideration should be given as to whether the member of staff should be suspended from their duties while an investigation is carried out. Schools are obliged to make every effort to maintain confidentiality and guard against unwanted publicity up to the point where the accused person is charged with an offence, or until the DfE/TRA publish information about an investigation or decision in a disciplinary case.

The school follows the guidance in KCSIE (2020) Part Four where a concern includes an allegation that might meet the harm threshold, i.e. an allegation that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity with children in a school.

If a pupil makes an allegation against the DSL with responsibility for Child Protection, the member of staff receiving the allegation must immediately inform the Headmaster who will inform the Chair of Governors, or the Governor with specific responsibility for Child Protection, currently Andrew Edwards. They will ensure the LADO is informed without delay. In case of serious harm, the police should be notified from the outset.

The Disclosure and Barring Service (DBS) will be notified within one month of any person leaving the School whether employed, contracted, a volunteer or student whose services are no longer used because he or she is considered unsuitable to work with children. The school also has a duty to consider making a referral to the Teaching Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed if he/she had not resigned) and a prohibition order would be appropriate.

Allegations found to be malicious are removed from personnel record; records are kept of all other allegations but those not substantiated, unfounded or malicious are not referred to in employer references.

If there has been a substantiated allegation against a member of staff, the school will work with the LADO to determine whether there are any improvements to be made to the school's procedures or practice to help prevent similar events in the future.

xiii) Procedures for acting when abuse by the Head is alleged

Procedures follow those specified in section 5.xii above, except that the abuse should be reported to the Chairman of Governors (Sir Clive Loader) without informing the Head or DSL first. The Chairman of Governors or DSL will inform the LADO without delay within 24 hours and any action taken should be by the Chair or other members of the Governing Body.

xiv) Procedures for acting when abuse by a volunteer is alleged

Procedures follow those specified in section 5.xii above.

xv) Procedures for acting when abuse by another student is alleged

Procedures follow those specified in the sections above, including contacting Social Services (MASH) within 24 hours of disclosure.

xvi) Private Fostering

A private fostering arrangement is essentially one that is made privately (that is to say without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or close relative with the intention that it should last for 28 days or more. Private foster carers may be from the extended family, such as a cousin or great aunt. However, a person who is a relative under the Children Act 1989 i.e. a grandparent, brother, sister, uncle or aunt (whether of the full or half blood or by marriage) or step-parent will not be a private foster carer. A private foster carer may be a friend of the family, the parent of a friend of the child, or someone previously unknown to the child's family who is willing to privately foster a child.

Schools sometimes make arrangements for their children to have learning experiences where, for short periods, the children may be provided with care and accommodation by a host family to which they are not related. This might happen, for example, as part of a foreign exchange visit or sports tour. Such arrangements could amount to 'private fostering' under the Children Act 1989 or the Safeguarding Vulnerable Groups Act 2006, or both.

If Bedford School makes the private fostering arrangement for the child with the host, it will request a DBS enhanced check (which will include barred list information) to help determine the host's suitability for the arrangement. However, where the parents make the arrangements themselves, this will be a private matter between the child's parents and the host parents and in these circumstances the school will not be acting as the regulated activity provider. The DBS cannot access criminal records held overseas. Host families in other countries, therefore, cannot be checked in the same way by local authorities as schools and colleges in the UK when children stay abroad.

Where the school has not been involved in making a private fostering arrangement but a member of staff or volunteer at a school becomes aware that a pupil may be in a private fostering arrangement, e.g. where a child under the age of 16 (or 18 if disabled) is provided with care and accommodation by someone to whom they are not related in that person's home, they should raise this in the first instance with the DSL. The school will notify the local authority of the circumstances, and the local authority will check that the arrangement is suitable and safe for the child.

xvii) Online safety

The school takes online safety seriously and recognises the risks posed by the internet and technology to children. Areas of risk include: online content (being exposed to harmful material); contact (being subjected to harmful interaction with others online); and conduct (personal online behavior that increase the likelihood of, or causes harm).

The school has appropriate filters and monitoring systems in place in its IT system which blocks users from accessing unsuitable, age-inappropriate or dangerous material. We take a whole-school approach to online safety. This includes a policy on the use of mobile technology in school. We ensure that boys in our school are taught about safety online in line with DfE guidance in [Teaching Online Safety In Schools](#) (2019), in the PSHE programme and in assemblies. Online safety training for staff is integrated in the annual safeguarding training and updates provided to all school staff, including part time staff. This includes guidance to enable staff to identify children who may be at risk of harm as a result of their or others' use of technology or the internet, and how to intervene and escalate such cases appropriately in accordance with the child protection procedures set out in this policy.

During the Covid-19 lockdown the school operated fully online. Some teaching and school activities will continue to operate online. The school follows guidance set out in KCSIE 2020 (Annex C) and in [Safeguarding and Remote Education during Coronavirus](#) (May 2020).

Where staff are interacting with children online, they will continue to follow our existing Staff Code of Conduct and the Use of Information Technology Network Policy.

Rules for Remote Learning:

- Personal email or other social media accounts must not be used for communication between pupils and staff. All communication should be through school accounts.
- Only video communication through Office 365, e.g. Microsoft Teams, will be endorsed or approved by the school. No other video conferencing platforms should be used.
- Any video communication should take place between 8.00am – 5.00pm, unless with prior permission from a member of CMT/SLT.
- Teachers should be professionally dressed and the background should be appropriate for professional use.
- Whilst 1:1 video communication may be necessary (for a meeting with a tutor or small class), staff must contact the Vice Master or the Acting Assistant Head (Pastoral) in the Prep School to notify the time and nature of the video communication. Teachers should be mindful of ratios in a video conference and should wait until there are two or more pupils logged in before switching on camera or microphones.

- In general, boys should not have their cameras switched on. If a teacher wishes boys to turn their cameras on during a lesson or a tutor period, they may request this, though they should keep a record of any such conversations (time, date and reason) which should be forwarded to the DSL.
- No recordings of live lessons involving pupils should be made or shared by pupils or teachers. A teacher can, however, record and share a video of themselves for teaching purposes, but these must adhere to strictly to DfE teachers' standards.
- If in doubt, always consult the DSL.

Staff must be alert to signs that a child may be at risk of harm online, and act on any concerns immediately. Tutors will make sure children know how to report any concerns they have back to School, and signpost them to other sources of support too.

xviii) Safe recruitment

Bedford School meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks. It ensures compliance with all relevant legislation, recommendations and guidance including the statutory guidance published by the Department for Education, 'Keeping Children Safe in Education' (2020), Disqualification Under the Child Care Act (2006) and the Prevent Duty Guidance for England and Wales (2015). The school's recruitment procedures are set out in a separate ['Recruitment, selection and disclosure policy and procedure'](#) document which is available on the school website. The school accepts broader safeguarding concerns such as making reports to the Disclosure and Barring Service (DBS) and pre-appointment checks on volunteers, staff of contractors, and other individuals that are not school staff or supply staff which must be completed according to the requirements set out in 'Keeping Children Safe in Education'.

6 Confidentiality

Members of staff may have access to confidential information about pupils in order to undertake their everyday responsibilities. In some circumstances staff may be given additional highly sensitive or private information.

- They should never use confidential or personal information about a pupil or her/his family for their own, or others', advantage (including partners, friends, relatives or other organisations).
- Information must never be used to intimidate, humiliate, or embarrass the pupil.
- Confidential information about a child or young person should never be used casually in conversation or shared with any person other than on a need to know basis. In circumstances where the child's identity does not need to be disclosed the information should be used anonymously.
- There are some circumstances in which a member of staff may be expected to share information about a child, for example when abuse is alleged or suspected. In such cases, individuals have a duty to pass on information without delay, but only to those with designated child protection responsibilities.
- If a member of staff is in any doubt about whether to share information or keep it confidential he or she should seek guidance from the DSL.

- Any media or legal enquiries should be passed to the Core Management Team.

7 Power and Position of Trust

- Wherever possible, staff should avoid behaviour which might be misinterpreted by others, and report and record any incident with this potential.
- Where a person aged 18 or over is in a position of trust with a child under 18, it is an offence for that person to engage in sexual activity with or in the presence of that child, or to cause or incite that child to engage in or watch sexual activity.

Bedford School does not use corporal punishment.

8 Contacts

Designated Safeguarding Lead	Daniel Koch Tel: 01234 362325 dkoch@bedfordschool.org.uk
Deputy Designated Safeguarding Leads	
Assistant Head (Prep School)	Rachel Stratton (currently on maternity leave) Simon Lincoln slincoln@bedfordschool.org.uk
Senior Boarding Housemaster	Chris Bury cbury@bedfordschool.org.uk
Senior Day Housemaster	Simon Everitt severitt@bedfordschool.org.uk
Safeguarding Officer for Governors	Dr Andrew Edwards
Chairman of Governors	Sir Clive Loader Tel: 01234 362241 or 01234 362244 (Contact via Bursary)
Bedford Borough Safeguarding Children Board (LSCB)	03003006676 www.bedfordshirelscb.org.uk
Local Authority Designated Officer (LADO)	Sandeep Mohan Tel: 01234 276693 lado@bedford.gcsx.gov.uk
Bedfordshire Police	Tel: 01234 841212 or dial 101 for non-emergency calls. For emergencies, dial 999, or 112 from a mobile.

Bedfordshire Police Children and Young People Development Officer and Schools Coordinator	Richard Denton Tel: (101) or 01234 275206 richard.denton@bedfordshire.pnn.police.uk
Bedford Borough Early Help Assessment	Kirsty Eaton and Sarah Rayner Tel: 01234 276817 Kirsty.eaton@bedford.gov.uk Sarah.rayner@bedford.gov.uk
Multi Agency Support Hub (MASH) Bedford Borough Council	Tel: 01234718700. Out of hours: 0300 300 8123. Multiagency@bedford.gov.uk
Senior Education Welfare Officer, Bedford Borough Education Support Services	Jane Ward Tel: 01234 276625 jane.ward@bedford.gov.uk
CAMHS	Jo Meehan Tel: 01234 310040 Jo.meehan@sept.nhs.uk
Prevent Duty Bedfordshire Police Contact	Richard Denton Tel: (101) or 01234 275206 richard.denton@bedfordshire.pnn.police.uk Anti-Terrorism Hotline Tel: 0800 789 321 DfE Dedicated Contact Tel: 0207 340 7264 counter-extremism@education.gsi.gov.uk
Children Missing Education Officer	Debi Momi Tel: (01234) 228178, ext, 42178 debi.momi@bedford.gov.uk
Education Development Manager Harpur Trust	Hannah Oldridge Tel: 01234 369535 holdridge@harpurtrust.org.uk
NSPCC whistleblowing helpline	Tel: 0800 028 0285. The line is available from 8:00 AM to 8:00 PM, Monday to Friday. Email: help@nspcc.org.uk

Further information is available from the following websites:

www.dcsf.gov.uk

www.nspcc.org.uk

DBS referrals address:

PO Box 181 Darlington County Durham DL1 9FA
Helpline Tel: 01325 953 795

Daniel Koch
Vice Master
Designated Safeguarding Lead
September 2020
Review date: September 2021

Appendix 1: Child Protection Summary

The following checklist of the main points concerning child protection may be useful to you if you are dealing with any suspicions or disclosures of abuse, whether this is neglect, physical, sexual or emotional abuse; whether it relates to CSE, FGM or potential radicalisation and whether the suspected abuser is an adult at home, an adult in school, another child or an unknown person:

If you **suspect** that a child is being abused but you don't know for sure, speak to the DSL, Daniel Koch, who will advise on the best course of action. The Assistant Head of the Prep School, currently Simon Lincoln, is also trained as a Designated Safeguarding Lead and concerns about safeguarding in the Prep School may be brought to her attention in the first instance. If the designated safeguarding lead(s) are unavailable, the Head Master, James Hodgson, will act for Daniel Koch and the Prep School Headmaster, Ian Silk, will act for Simon Lincoln. If the Heads are also absent, the Senior Boarding Housemaster (Chris Bury) and Senior Day Housemaster (Simon Everitt) are also trained as DSLs and will take responsibility for handling safeguarding concerns in any part of the school. You will subsequently need to document your concern in writing. If the abuse has been perpetrated by another child, refer both children. You should then continue to monitor the situation and report any developments.

If you **know** that a child is being abused, you must speak immediately to Daniel Koch, or, in the Prep School, Simon Lincoln. Do not delay your report.

If, at any point, there is a risk of immediate serious harm to a child a referral should be made to Bedford Borough children's social care (MASH) 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.

If a child wants to make a disclosure, receive the account and pass on the details, as above. Reassure the child but never probe. Write down what happened in detail with dates and time, and, as far as possible, the exact words of the child, very soon after the disclosure. Never guarantee confidentiality and never refuse to hear parts of disclosures. Avoid giving physical comfort, especially if you are alone with the child. Never contact parents. There may be information that you do not know. It is likely that parents will be spoken to before referral but only the DSL should speak to parents, although you may be required to be present at interviews with parents. The DSL or the Headmaster will liaise with external agencies as appropriate.

Don't overlook the trivial: report all concerns so that we can see patterns when necessary. Staff members working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child.

Be vigilant and listen well: abuse can and does happen to children in all types of schools. The child's welfare is the single most important factor. Pass on information promptly.

The School's full policy and more detailed information and advice (above) can be found on the School website. Bedford School does not use corporal punishment.

Daniel Koch
Vice Master
Designated Safeguarding Lead
September 2020
Review date September 2021

Appendix 2: Staff Code of Conduct

All staff and volunteers should read this code of conduct in conjunction with the school's Safeguarding Policy. Although this code of conduct gives advice and instruction on how to deal with specific situations, it should not replace professional common sense and good judgement. Points 1-20 deal primarily with interactions with pupils. Point 21 address interactions with other members of staff and point 22 gives some guidance on other professional obligations for teaching staff. Any breaches of the code will be treated in accordance with the School's disciplinary policy. All staff will be expected to sign to confirm that they have read the code of conduct.

1 Underpinning Principles

- The welfare of the child is paramount (Children Act 1989).
- Staff are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- Staff should work, and be seen to work, in an open and transparent way.
- Staff should discuss and/or take advice promptly from their line manager or another senior member of staff over any incident which may give rise to concern.
- Records should be made of any such incident and of decisions made/further actions agreed, in accordance with school policy for keeping and maintaining records.
- Staff should apply the same professional standards regardless of gender, sexuality, age, disability, gender re-assignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation.
- All staff should know the name of their Designated Safeguarding Lead (Daniel Koch), be familiar with local child protection arrangements and understand their responsibilities to safeguard and protect children and young people.
- Staff should be aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them.

2 Duty of Care

Teachers and other education staff are accountable for the way in which they exercise authority, manage risk, use resources and protect pupils from discrimination and avoidable harm. All staff, whether paid or voluntary, have a duty to keep young people safe and to protect them from physical and emotional harm. This duty is in part exercised through the development of respectful, caring and professional relationships between staff and pupils and also through the behaviour demonstrated by staff which reflects integrity, maturity and good judgement.

Local Authorities (LAs), schools and parents have legitimate expectations about the nature of professional involvement in the lives of pupils. When individuals accept a role that involves working with children and young people, they must understand and acknowledge the responsibilities and trust inherent in that role.

3 Exercise of Professional Judgement

This guidance cannot provide a complete checklist of what is, or is not, appropriate behaviour for staff. However, it does highlight behaviour that is illegal, inappropriate or

inadvisable. There will be occasions and circumstances in which staff have to make decisions or take action in the best interests of the child or young person which could contravene this guidance or where no guidance exists. Individuals are expected to make judgements about their behaviour in order to secure the best interests and welfare of the children in their charge and, in so doing, will be seen to be acting reasonably. Ideally individuals should:

- Discuss any proposed action with a senior colleague whenever possible.
- Record the events and any discussions/actions taken with reasons.

4 Power and Position of Trust

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people in educational settings are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

- Wherever possible, staff should avoid behaviour which might be misinterpreted by others, and report and record any incident with this potential.
- Our approach should be concerned, but professionally detached. Pupils should not be encouraged to develop excessive reliance on individual staff members.
- Where a person aged 18 or over is in a position of trust with a child under 18, it is an offence for that person to engage in sexual activity with or in the presence of that child, or to cause or incite that child to engage in or watch sexual activity.
- Staff should under no circumstances engage in a romantic or sexual relationship, or any sort of friendship which blurs professional boundaries, with a pupil in this school or a pupil in other school. Staff should not have unprofessional relations with recently-left former pupils of the school.

5 Confidentiality

Members of staff may have access to confidential information about pupils in order to undertake their everyday responsibilities. In some circumstances staff may be given additional highly sensitive or private information.

- They should never use confidential or personal information about a pupil or her/his family for their own, or others', advantage (including partners, friends, relatives or other organisations).
- Information must never be used to intimidate, humiliate, or embarrass the pupil.
- Confidential information about a child or young person should never be used casually in conversation or shared with any person other than on a need to know basis. In circumstances where the child's identity does not need to be disclosed the information should be used anonymously.
- There are some circumstances in which a member of staff may be expected to share information about a child, for example when abuse is alleged or suspected. In such cases, individuals have a duty to pass on information without delay, but only to those with designated child protection responsibilities.
- If a member of staff is in any doubt about whether to share information or keep it confidential he or she should seek guidance from a senior member of staff.
- Any media or legal enquiries should be passed to the Core Management Team.

6 Propriety and Behaviour

All staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children and young people. They should adopt high standards of personal conduct in order to maintain the confidence and respect of their peers, pupils and the public in general.

An individual's behaviour, either in or out of the workplace, should not compromise her/his position within the work setting.

Staff should never:

- Make sexual remarks to a student or use any sort of sexual innuendo (including in email or any other form of communication).
- Discuss their own sexual relationships with, or in the presence of, students.
- Humiliate or demean a student or encourage others to do so.
- Swear or use offensive language, including language which is discriminatory, in front of pupils.

Careful consideration but be given to the use of books or videos of an explicit or sensitive nature, particularly in relation to language or sexual behaviour, and due consideration should be given to the recommended age of films shown in class. There should always be a clear and demonstrable link with the scheme of work.

Staff have a duty to set a responsible example to pupils. They must therefore not consume alcohol in front of pupils unless at an appropriate school event, and in all cases alcohol must be consumed only in moderation, including on school trips. No smoking is allowed on the school site.

Where a member of staff or volunteer is involved in an incident outside of school which did not involve children, it could still have an impact on their suitability to work with children. The school may consider what triggered the member of staff's actions and whether a child in the school could trigger the same reaction, therefore being put at risk.⁸

7 Dress and Appearance

Staff should dress in a way that should project a professional image to pupils, parents and other members of our community at all times. This will normally mean that standard business-style attire is worn for most school days, with appropriate kit for games, etc. being worn only at the necessary times.

Staff should consider:

- The manner of dress and appearance appropriate to their professional role which may be different from that adopted in their personal life.
- Staff should ensure that they are dressed decently (not viewed as offensive, revealing or sexually provocative), safely and appropriately for the tasks they undertake.

⁸ See KCSIE 2020, pp. 116-117.

- Those who dress or appear in a manner which could be considered as inappropriate could render themselves vulnerable to criticism or allegation.

8 Infatuations

Staff must be aware that it is not uncommon for pupils to be strongly attracted to a member of staff and/or develop an infatuation. All situations should be responded to sensitively to maintain the dignity of all concerned. Staff should also be aware that such circumstances always carry a high risk of words or actions being misinterpreted or for allegations to be made against staff.

A member of staff who becomes aware that a pupil may be infatuated with them, or with a colleague, should discuss this at the earliest opportunity with a senior colleague so that appropriate action can be taken. In this way, steps can be taken to avoid hurt, embarrassment and distress for all concerned.

9 Social Contact

Staff should not establish or seek to establish social contact with pupils for the purpose of securing a friendship or to pursue or strengthen a relationship. Even if a young person seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise her/his professional judgement in making a response and be aware that such social contact could be misconstrued.

Staff should not give their personal details such as home phone number or home email address to pupils unless the need to do so is agreed with the Core Management Team. School email should be used for communicating with pupils in accordance with school policy. Personal email addresses should not be used and contact with a pupil via private social media should not take place; if in doubt, speak to the DSL.

Staff should usually only write letters or send emails to individual pupils about routine matters of academic study or pastoral care. Staff should avoid contacting pupils at home unless this is strictly necessary – keep a record of any such occasion and inform the DSL. If a member of staff believes it necessary to write a personal note or give a gift to an individual pupil, they should discuss the purpose and context with the Vice Master or Deputy Head of the Prep School. Staff should not give gifts to an individual pupil outside of the school reward system, although small prizes for competitions, etc. are acceptable.

Staff should not enter boarding houses unless they are key members of staff within that house, or are expressly invited by the Housemaster or Vice Master for a specified purpose.

Staff should not attend private pupil parties and should be aware of their professional standing and responsibilities when attending parties arranged by parents at which pupils are also present. Staff who are parents of pupils, friends with parents of pupils or voluntary workers in youth organisations attended by pupils should still use their professional judgement to respect the spirit of this code. If in doubt, seek the advice of the Vice Master or Deputy Head of the Prep School.

I 0 Physical Contact

There are occasions when it is entirely appropriate and proper for staff to have physical contact with pupils, but it is crucial that they only do so in ways appropriate to their professional role.

A 'no touch' approach is not always practical. When physical contact is made with pupils this should be in response to their needs at the time, limited in duration and appropriate given their age, stage of development, gender, ethnicity and background. Appropriate physical contact in schools may occur most often with younger pupils.

It is not possible to be specific about the appropriateness of each individual occurrence of physical contact, since an action that is appropriate with one child in one set of circumstances may be inappropriate in another, or with a different child. Staff should, therefore, use their professional judgement at all times.

Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority. If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be recorded as soon as possible and copies given to the DSL.

There are occasions where a member of staff may need to use 'reasonable force', for example to prevent pupils from hurting themselves or others. The school advises staff to read the government's guidance on [Use of reasonable force](#) (2013). The need to use force with pupils is extremely rare. If force is used, the member of staff should inform the DSL of the full details as soon as possible.

I 1 Activities which may require Physical Contact

Some staff; for example, those who teach PE and games, or those who offer music tuition, will on occasions have to initiate physical contact with pupils in order to support a child so they can perform a task safely, to demonstrate the use of a particular piece of equipment/instrument or to assist them with an exercise. This should be done with the pupil's agreement.

Contact under these circumstances should be for the minimum time necessary to complete the activity and take place in an open environment. Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the child.

I 2 Showers and Changing

Young people are entitled to respect and privacy when changing clothes or taking a shower. However, there needs to be an appropriate level of supervision in order to safeguard young people, satisfy health and safety considerations and also to ensure that bullying or teasing does not occur. This supervision should be appropriate to the needs and age of the young people concerned and sensitive to the potential for embarrassment.

Staff would therefore need to be vigilant about their own behaviour, ensure they follow agreed guidelines and be mindful of the needs of the pupils.

I3 Pupils in Distress

There may be occasions when a distressed pupil needs comfort and reassurance. This may include age-appropriate physical contact. Staff should remain self-aware at all times in order that their contact is not threatening, intrusive or subject to misinterpretation.

Where a member of staff has a particular concern about the need to provide this type of care and reassurance she/he should seek further advice from a senior manager.

I4 Behaviour Management

All pupils have a right to be treated with respect and dignity. Bedford School does not use corporal punishment. Corporal punishment is unlawful in all schools. Equally, staff should not use any form of degrading treatment to punish a pupil. The use of humour can help to defuse a situation. The use of sarcasm, demeaning or insensitive comments towards pupils is not acceptable in any situation.

I5 Sexual Contact with Young People

Any sexual behaviour by a member of staff with or towards a child or young person is both inappropriate and illegal. Children and young people are protected by the same laws as adults in relation to non-consensual sexual behaviour. They are additionally protected by specific legal provisions regardless of whether the child or young person consents or not. There are occasions when adults embark on a course of behaviour known as 'grooming' where the sole purpose is to gain the trust of a child, and to manipulate that relationship so sexual abuse can take place. Staff should be aware that conferring special attention and favour upon a child might be construed as being part of a 'grooming' process, which is an offence.

I6 One to One Situations

Staff working in one to one situations with children and young people may be more vulnerable to allegations. Teachers and others must recognise this possibility and should plan and conduct such meetings accordingly. Every attempt should be made to ensure the safety and security needs of both staff and pupils are met.

- Ensure all meetings whenever possible take place in an open area and not in remote or secluded locations around the School.
- Wherever possible, ensure there is visual access and/or an open door in one-to-one situations. If possible, use a door stop to keep doors open.
- Inform other staff of the meeting beforehand, assessing the need to have them present or close by.
- Always report to a senior colleague any situation where a student becomes distressed or angry.
- Pre-arranged meetings with pupils away from the School premises should not be permitted unless approval is obtained from their parent and the Headmaster or other senior colleague with delegated authority.
- Staff should not convey a student in a private vehicle unless advice has been sought from the Vice Master or arrangements made with the parents of the child.

17 Educational Visits and After School Clubs

Staff should take particular care when supervising pupils in the less formal atmosphere of a residential setting or after-school activity.

During school activities that take place off the School site or out of school hours, a more relaxed discipline or informal dress and language may be acceptable. However, staff remain in a position of trust and need to ensure that their behaviour cannot be interpreted as seeking to establish an inappropriate relationship or friendship.

Where out of school activities include overnight stays, careful consideration needs to be given to sleeping arrangements. Pupils, staff and parents should be informed of these prior to the start of the trip.

Health and Safety arrangements require members of staff to keep colleagues/employers aware of their whereabouts, especially when involved in an out of school activity.

Dress on trips must be suitable and appropriate. Although dress will likely be less formal, it should still be in keeping with the advice in point 7 above, namely that it is decent (not viewed as offensive, revealing or sexually provocative), safe and appropriate for the tasks being undertaken. Staff members on trips are 'on duty' throughout, unless time 'off duty' is explicitly granted by the trip leader.

Staff should only consume alcohol on trips in moderation. They should at no stage be considered inebriated when in charge of pupils or near pupils. For pupils, the Alcohol Policy applies on trips just as in school.

18 Internet Use

The School has a clear policy for access and use of the Internet. Under no circumstances should adults in school access inappropriate images. Accessing child pornography or indecent images of children on the internet, and making, storing or disseminating such material, is illegal and, if proven, will invariably lead to the individual being barred from working with children and young people.

Using school equipment to access inappropriate or indecent material, including adult pornography, is a breach of the School's ICT usage policy and is likely to result in disciplinary action being taken. See 'Social Conduct' in section 9 above for guidance about email and social media.

19 Whistle-blowing

Bedford School aims to create a culture of safety and sharing concerns, valuing staff and of reflective practice. Whistle-blowing is the mechanism by which staff can voice their concerns, made in good faith, without fear or repercussion. Staff should acknowledge their individual responsibilities to bring matters of concern to the attention of the Vice Master, Head Master and/or relevant external agencies as outlined in the Safeguarding and Child Protection Policy. This is particularly important where the welfare of children may be at risk.

If a staff member feels unable to raise a safeguarding issue within the school, or that their genuine concerns are not being addressed, other whistleblowing channels are open to them. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285. The line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk.

20 Sharing Concerns and Recording Incidents

All staff should be aware of the School's Child Protection procedures, including procedures for dealing with allegations against staff. Staff who are the subject of allegations are advised to contact their professional association. In the event of an incident occurring, which may result in an action being misinterpreted and/or an allegation being made against a member of staff, the relevant information should be clearly and promptly recorded and reported to the DSL or Headmaster.

Members of staff should feel able to discuss with their line manager any difficulties or problems that may affect their relationship with pupils so that appropriate support can be provided or action can be taken.

It is a requirement to report to the Disclosure and Barring Service (DBS) within one month of leaving the School, any person (employed, contracted, a volunteer or student) whose services are no longer used because he or she is considered unsuitable to work with children. In this context, ceasing to use a person's services includes dismissal, non-renewal of a contract, no longer using a teacher from a supply agency, terminating a student's placement, no longer using staff employed by contractors, no longer using volunteers, resignation or voluntary withdrawal from any of the above. Cases of serious misconduct by a teacher or anyone undertaking teaching work will be reported to TRA according to its [guidance](#).

21 Dignity at Work (Interactions with other members of staff)

Staff must not engage in any behaviour or conduct which may amount to harassment of another person at work. Harassment of any kind is regarded as a disciplinary offence and in serious instances may lead to instant dismissal. The full [Dignity at Work Policy](#) is available on SharePoint. Staff are expected to read and abide by it.

Harassment may take the form of unwanted conduct which is related to a relevant protected characteristic which is perceived as affecting an employee's dignity at work. It may also take the form of unwanted conduct towards someone based on their appearance or other personal characteristics which is perceived as affecting their dignity at work. It is not only unwanted physical contact, assault or propositions; it includes suggestive remarks or gestures, pin-ups, graffiti, offensive comments, jokes and banter. Harassment may include bullying, intimidating behaviour, persistent teasing or constant unfounded criticism of the performance of work tasks, unfair allocation of work and responsibilities, or exclusion from normal work place conversation. It may be directed towards one individual or a group. A single incident can amount to harassment if sufficiently grave.

22 Other professional obligations for teaching staff

All teaching staff should refer to the Staff Handbook on SharePoint for details of further expectations. Teachers should also be aware of the key features of the regulatory system for teachers introduced on 1st April 2012 and of the type of conduct which could lead to the imposition of a prohibition order by the Secretary of State. Examples of such misconduct include violence, offences related to terrorism, fraud, serious dishonesty, class A drugs (particularly if supplying is involved), serious sexual misconduct, arson and other major criminal damage, serious driving offences (particularly those involving alcohol or drugs), serious offences involving alcohol, serious offences involving gambling and possession of prohibited firearms, knives or other weapons.

Daniel Koch
Vice Master
Designated Safeguarding Lead
September 2020
Review date September 2021

Appendix 3: Children Missing Education Policy

Children missing education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. This policy has regard to the DfE statutory guidance [Children Missing Education](#) (2016); the Education (Independent Schools Standards) Regulation 2014, Part 3, paragraph 15; section 175 of the Education Act 2002; Keeping Children Safe in Education (2020) and Working Together to Safeguard Children (2018).

The school recognises its duty to act with the Local Authority to identify children missing education and shares a belief that all children are entitled to an efficient, full time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Children go missing for a range of reasons and they may be at risk of significant harm.

Procedures to identify and respond to children who go missing

The school maintains an Admissions Register. If a pupil fails to attend school on the first agreed day of attendance, the school will undertake reasonable enquiries to establish the child's whereabouts and consider notifying the local authority at the earliest opportunity, especially if the child's whereabouts cannot be ascertained.

The school has safeguarding duties under section 175 of the Education Act 2002, and as part of this must investigate any unexplained absences. Pupils' attendance is monitored through its daily Attendance Register by tutors, Housemasters and the DSL. The school registers all pupils a minimum of twice each full school day, once at the start of the morning session and once during each afternoon session. Staff should report any concerns about a pupil's extended absence immediately to the DSL.

The school follows Bedford Borough's [guidance](#) on reporting the details of pupils who fail to attend school regularly. The School must report any continuous pupil absences, greater than 10 school days, where no reason is given, but may report sooner.

The school will hold more than one emergency contact number for each pupil wherever reasonably possible. This will be monitored using the school's database and parent or guardian of any pupil with fewer than two contacts numbers will be requested to provide an additional number.

Notifying the Local Authority

The school will inform the Local Authority where a pupil's name is going to be deleted from the admission register in cases:

- when the child has been taken out of school to be home educated
- when the family has apparently moved away;
- when the child has been certified as medically unfit to attend;
- when the child is in custody for more than four months;
- when the child has been permanently excluded.

The Local Authority will also be notified when the School removes or adds a pupil's name to the admissions register at non-standard transitions, and will also provide information to the local authority for standard transitions if requested. The school recognises children missing education as a safeguarding issue, particularly when a child leaves school with no known destination, and will therefore also copy in the local authority where the child is normally resident.

Daniel Koch
Vice Master
Designated Safeguarding Lead
September 2020
Review date September 2021