

SEVENOAKS SCHOOL

SUMMER PROGRAMMES

Safeguarding Policy

Introduction for Parents

The law and KCSIE defines someone as a child until they are eighteen years old.

Schools and their staff form part of the wider safeguarding system for children, to protect children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. Risks of harm include e.g. drugs, alcohol, gangs, neglect, abuse, sexual exploitation, consensual or non-consensual sharing of nudes and semi-nude images or videos (formerly sexting), female genital mutilation, risk of radicalisation), whether these come from within their family or are the product of outside influences. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the **best interests** of the child. Everyone has the right to protection from abuse regardless of sex, race and ethnicity, disability, sexual orientation, religion/ beliefs, marriage/civil partnerships, pregnancy/ maternity and gender reassignment

Children from all types of background may be abused physically, emotionally, sexually or through neglect. It is not always easy to recognise or accept that abuse is happening. If you have concerns about a child you should contact Social Services, the Police or the NSPCC.

Sometimes parents or students tell us that they believe a child is being abused; a student might tell us themselves or their behaviour changes in a way that means they could be being abused. If this happens we have a legal duty to tell Social Services of any concerns we have of possible child abuse. In some cases we can talk to the family but you may first hear from Social Services. We understand that this would be upsetting, but in certain circumstances we are required to contact Social Services not the family.

The Pastoral Deputy Head is responsible for dealing with concerns about child welfare. [Our policy](#) is on the school's website and has regard to:

- [*Keeping Children Safe in Education \(KCSIE\) 2024*](#)
- [*Working together to safeguard Children \(WTSC\) updated December 2023*](#)
- [*What to do if you are Worried a Child is Being Abused - Advice for Practitioners*](#)
- [*Sexual Violence and Sexual Harassment Between Children in Schools and Colleges \(September 2021\)*](#)
- [*Relationships Education, Relationships and Sex Education \(RSE\) and Health Education \(2019, updated September 2021\)*](#)
- [*Children Missing Education \(September 2016\)*](#)

• [Equality Act 2010](#)

Other references:

- Prevent Duty Guidance (December 2023)
- The use of social media for on-line radicalisation (July 2015)
- UKCIS (I+UK Council for Internet Safety)

Mental Health and Wellbeing Support in Schools and Colleges

Policy for Staff

Introduction

Staff should at all times maintain a professional relationship with our students. The Sevenoaks School Summer Programme enjoys a reputation for close and happy relationships between staff and students; but common sense, as well as legal and procedural guidance requires staff to maintain a proper professional detachment from all students including those who are over the age of 18. Staff need to be aware of the national increase in the number of reported allegations by students of abuse or professional misconduct by teachers.

The policy has been developed in accordance with Working Together to Safeguard Children (July 2023) (WTSC), Keeping Children Safe in Education (September 2024) (KCSIE), Boarding Schools' National Minimum Standards (2022), and Kent and Medway Safeguarding Children Handbook (KSCB and Medway Safeguarding Children Board,), Prevent Duty Guidance (December 2023) and FGM Guidelines.

The Children Act (1989) defines 'children in need' as those whose vulnerability is such that they are unlikely to reach or maintain a satisfactory level of health or development, or their health or development will be significantly impaired without the provision of services of the Act. This includes those who are suffering or likely to suffer significant harm. A person, usually known to the young person (parent, carer or person in institutions or community settings or another child) may abuse or neglect a child by inflicting harm or failing to act to prevent harm. Children with SEN or disabilities may be particularly vulnerable. This policy gives the procedure to be followed:

- (a) for the management of safeguarding.
- (b) if a staff member suspects a child is being neglected/abused or at risk of being drawn into extremism, or a student makes a disclosure
- (c) to assist staff to protect themselves from criticism or accusations of malpractice which could potentially damage their careers.
- (d) if allegations are made of misconduct by staff or volunteer.
- (e) for appointing new staff or volunteers and arranging for visits by non-staff.

It should be read in conjunction with the Anti-Bullying Policy, Behaviour Policy, Missing Student Policy, Staff Code of Conduct, Physical Restraint Policy, Whistle Blowing Policy, Intruder Policy, NMS and PSHE policy.

Types of abuse and neglect (from KCSIE)

Abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

- **Abuse** A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children.
- **Physical Abuse** A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to the child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- **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 or 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 to frequently feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of ill treatment of a child, although it may occur alone.
- **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 nonpenetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.
- **Neglect** The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food, shelter and clothing (including exclusion from home or abandonment), failing to protect a child from physical or emotional harm or danger, failing to ensure adequate supervision (including the use of inadequate care-givers) or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
- **Serious violence** All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or

gangs and may be at risk of criminal exploitation. All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as having been frequently absent, or permanently excluded from school, having experienced child maltreatment and having involved in offending, such as theft. Staff should also be aware that male students are statistically most likely to be at risk in this area, but that trans and non-binary students are also at risk. Indeed staff should not assume that girls are not at risk in this area and are encouraged to see behaviour as the primary indicator of risk.

- **Child sexual exploitation (CSE) and Child Criminal Exploitation (CCE)**

These are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female. 8 Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

CSE is a form of sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include noncontact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. CSE can occur over time or be a one off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

- **Domestic Abuse** Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

A child may suffer, or be at risk of suffering, from one or more types of abuse and abuse may take place on a single occasion or may occur repeatedly over time. In all cases the Child in

Need/Child Protection Procedure should be followed, or that of the authority in which the child is normally resident.

- **Child-on-child abuse**

All staff should recognise that children are capable of abusing their peers (including online) and that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported. All child-on-child abuse is unacceptable and will be taken seriously. The school has a zero-tolerance approach to child-on-child abuse.

Child-on-child abuse includes, but is not limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers.
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence).
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery).
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

A summary copy of Kent's procedure is kept by the Deputy Head Pastoral; the full document is available on-line: <https://www.kelsi.org.uk/special-education-needs/integrated-childrens-services/front-door>

Signs of abuse and neglect (NSPCC)

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a

child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

Physical Abuse

Determining whether an injury is accidental or non-accidental is a skilled job. It requires a full assessment of the injury, explanation, history and circumstances. This is not the role of a teacher. Our medical team are available (in the first instance) should a teacher need to refer/discuss a child who they deem to have one or more of the physical/behavioural indicators listed below.

There are, however, a number of injuries which should be regarded with concern and may indicate a nonaccidental cause. Some may need medical assessment and treatment, occasionally urgently.

Injuries need to be accounted for. Inadequate, inconsistent, or excessively plausible explanations, or a delay in seeking treatment for the child, should signal concern.

Physical Indicators

- Unexplained injuries or burns, particularly if they are recurrent
- Untreated injuries or lingering injuries not attended to
- Bruises and abrasions around the face, particularly if they are recurring
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft areas of the face, e.g. cheeks
- Bite marks
- Burns or scalds (note the pattern and spread of the injury, e.g. cigarette burns)
- Wheals suggesting beatings

Behavioural Indicators

- Improbable excuses given to explain injuries
- Refusal to discuss injuries
- Admission of punishment which appears excessive
- Shrinks from physical contact
- Refusal/avoiding getting undressed for gym – keeps arms and legs covered in hot weather
- Fears medical help
- Self-harming behaviours
- Aggression towards others
- Over compliant behaviour or a 'watchful' attitude
- Deterioration in schoolwork
- Unexplained pattern of absences which may serve to hide bruises or other physical injuries
- Fears or is reluctant to return home or to have parents contacted

Emotional Abuse

Emotional abuse is often the most difficult to detect. A child might be clean and physically cared for but be emotionally neglected. The parents' or carer's attitude to the child might be characterised by coldness, hostility, disinterest. They may resort to scape-goating or humiliating the child and the giving of age-inappropriate responsibilities. They may give the impression that the child can never please, or may have expectations which are inappropriate, excessive or unrealistic.

Physical Indicators

- Delays in physical development, e.g. milestones delayed for underweight, lethargic (there may be medical reasons for this, medical advice is essential)
- Self-mutilation

Behavioural Indicators

- Delays in intellectual development
- Over-reaction to mistakes
- Continual self-deprecation
- Sudden speech disorders
- Social isolation – does not join in and has few friends
- Extremes of compliance, passivity and/or aggression/provocativeness
- Compulsive stealing, e.g. other children's packed lunches
- Rocking, thumb sucking, hair twisting, etc.
- Drug, alcohol, solvent abuse
- Fear of parents being contacted

Neglect

Severe neglect is often characterised by the child being underweight, small in stature and with a poor physique. The care of neglected children is often poor and they present as unwashed, unkempt and inadequately fed and clothed (e.g. thin cotton dresses and plastic sandals in snow).

However, poverty, deprivation and neglect are not the same thing. Children may live in poverty but only a small number of these will be neglected. Assessment over time and with the help of other agencies is vital.

Physical Indicators

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Untreated medical problems

Behavioural Indicators

- Social isolation – does not join in and has few friends
- Low self-esteem
- Frequent lateness or non-attendance
- Destructive tendencies
- Poor relationships with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking

Sexual Abuse

Sexual abuse affects a child or young person emotionally and physically. It is difficult to detect as the physical indicators are not directly visible. Often the indicators that a child is being sexually abused are exhibited through behaviour. Sexual abuse occurs in every class, cultural and occupational group. Sexually abused children may take refuge in an appearance of normality, e.g. some children immerse themselves in schoolwork as a way of 'blanking out' the abuse.

Emotional and behavioural difficulties may result for example from abuse and neglect, physical or mental illness, sensory or physical impairment, or psychological trauma. In some cases emotional and behavioural difficulties may arise from or be exacerbated by circumstances within the Summer Programme environment, for example, a change in teacher or routine. (*The Education of Children with Emotional and Behavioural Difficulties, Circular no. 9/94 DFEE 1994.*)

Physical Indicators

- 'Love bites'
- Other bite marks
- Self-harming behaviours (e.g. deep scratches/cuts on arms)
- Tiredness, lethargy
- Pregnancy or Sexually Transmitted Infections (STIs)

Behavioural Indicators

- Sudden changes in behaviour and performance
- Sexual awareness inappropriate to the child's age – shown for example in drawings, vocabulary, games, etc.
- Provocative sexual behaviour
- Frequent public masturbation
- Fear of undressing for gym
- Tendency to cry easily
- Regression to younger behaviour, e.g. thumb sucking, playing with discarded toys, acting like a baby
- Depression and withdrawal

Sexual exploitation can be very difficult to identify. Warning signs can easily be mistaken for 'normal' teenage behaviour. Young people who are being sexually exploited may:

- Be involved in abusive relationships
- Intimidated and fearful of certain people or situations
- Hang out with groups of older people, or antisocial groups, or with other vulnerable peers
- Associate with other young people involved in sexual exploitation
- Get involved in gangs, gang fights, gang membership
- Have older boyfriends or girlfriends
- Spend time at places of concern, such as hotels or known brothels
- Not know where they are, because they have been moved around the country
- Go missing from home, care or education

They may also show signs of sexual abuse or grooming.

Other Signs

Patterns of absence and prolonged absence may be indicators of safeguarding issues including sexual abuse and exploitation.

Safeguarding issues can manifest themselves via peer-on-peer abuse. This is most likely to include but not limited to: bullying (including cyber bullying), physical abuse (such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm), sexual violence and sexual harassment, gender-based violence, initiation/hazing type violence and rituals.

Signs of radicalisation

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. Staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Children at risk of radicalisation may display different signs or seek to hide their views.

Signs of Female Genital Mutilation

This is most likely to be identified through disclosures, but other indicators can be found here: <https://www.gov.uk/government/publications/female-genital-mutilation-guidelines>.

Management of Safeguarding

The Governors must read and comply with KCSIE, and ensure all staff who work directly with children read at least Part 1 and Annex B and staff who do not work directly with children Part 1 or Annex A depending on their role.. They should ensure that mechanisms are in place to assist all staff to understand and discharge their role and responsibilities as set out in Part 1 of the guidance. Governors must ensure that the Safeguarding Policy is effective, in accordance with government guidance and local safeguarding partnership (Kent Safeguarding Children Multi Agency Partnership (KSCMP)) procedures are in place for appropriate responses to children who go missing from education particularly on repeated occasions and that the Staff Code of Conduct covers, amongst other things, acceptable use of technologies, staff/student relationships and communications including the use of social media. The school, as a Charity, also has regard to Charity Commission guidance on charity and trustee duties to safeguard children.

All governors receive appropriate safeguarding and child protection (including online) training at induction. This training equips them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the school are effective and support the delivery of a robust whole school approach to safeguarding. Their training is regularly updated and includes awareness of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.

Governors must ensure that the ICT filters are appropriate and monitoring systems are in place but should be careful that 'overblocking' does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding. DfE guidance Teaching Online Safety in School gives further details. ICT policies cover the 4 Cs in KCSIE:

- content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying).
- commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams. The Education Committee reviews online safety, and the Deputy Head Pastoral reports at least annually to the Board of Governors on Safeguarding. The policy is reviewed at least annually and when there is any change in guidance such as KCSIE or following any safeguarding issue and is approved and endorsed by the Governors each year. The Governor who takes a lead on safeguarding is Mrs Eliza Ecclestone.

The Designated Safeguarding Lead (DSL)

The DSL is the most likely person to have a complete safeguarding picture and to be the most appropriate person to advise on the response to safeguarding concerns.

The DSL is responsible for: Managing referrals of students who have suffered or likely to suffer significant harm, and liaising with relevant agencies for students who need support through the Common Assessment Framework (CAF) and Team Around the Child (TAC) or the Channel guidance.

Refer all cases of suspected abuse to the local authority children's social care and:

- The Local Authority Designated Officer (formerly LADO now Designated Officer) for child protection concerns (all cases which concern a staff member).
- Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child).
- Police (cases where a crime may have been committed).
- Liaise with the Head to inform them of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

Training

The DSL will obtain access to resources and attend any relevant or refresher training courses. The DSL should receive formal appropriate training carried out every two years, but in addition their knowledge and skills should be updated, (for example via e-bulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments), at regular intervals, but at least annually, to keep up with any developments relevant to their role in order to:

Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments, and maintaining appropriate records.

- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Maintain up to date awareness of issues about safeguarding including FGM and risk of radicalisation. (DSL have also undergone on-line training)
- Ensure each member of staff has access to and understands the safeguarding policy and procedures, especially new and part time staff. All staff should know what to do if a child tells them they are being abused or neglected. All staff members and volunteers will receive

appropriate safeguarding and child protection training which is regularly updated. In addition all staff members will receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively and to be able to keep detailed, accurate, secure written records of concerns and referrals. All staff should be aware of the local early help processes and the process for making referrals to childrens' social care and understand their roles in these.

- All staff and volunteers are given an induction on Safeguarding including the identity of the DSL(s), the school's policy and procedure for missing Students and Students missing education, that peer on peer abuse may occur including sexual violence and sexual harassment, that they have a responsibility to speak up about safeguarding and welfare matters within the school (and to external agencies where necessary), and provided with the staff code of conduct and whistle-blowing policies and a copy of KCSIE Part 1 and Annexe A. Through discussion in training and occasional questions we ensure that staff and volunteers know and understand KCSIE Part 1 and Annexe A.

Raising Awareness and Sharing Concerns

The DSL will encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the Summer Programme may put in place to protect them. To remind staff of the need to maintain an attitude of 'it could happen here' where safeguarding is concerned, and that when concerned about the welfare of a child, staff members should always act in the best interests of the child. All staff and volunteers have a responsibility to be alert to the behaviour of other adults working with children and must share any concern about the behaviour of another adult towards or around a student (including all staff members and volunteers) with the Designated Safeguarding Lead (see Code of Conduct). They must also share any concern about peer-on-peer abuse with the DSL.

The DSL should ensure the school's policies are known and used appropriately:

- Ensure the school's safeguarding policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this.
- Ensure the safeguarding policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this.
- Link with the local LSCB to make sure staff are aware of the latest local policies on safeguarding.

Procedures

General strategies:

The Summer Programme ensures that students have a range of appropriate adults who they feel confident to approach if they are in difficulty.

If a member of staff has any concerns about a child's welfare they should act on them and immediately see the DSL. The context within which incidents and/or behaviour occur is important and should be considered and included in any referral.

If a member of staff suspects any safeguarding issue or has concerns that a student is at risk of being drawn into extremism: Inform the DSL who will consult with the Head and decide on the

course of action. Confidentiality is of the utmost importance and must be maintained on a need-to-know basis.

Although the Summer Programme has responsibilities under the Children Act to ensure the welfare of students in its care, the decision to take action to protect a young person is the responsibility of the "authorised agencies", i.e. the Social Services Department or Police.

The Area Safeguarding Adviser and Social Services Department are available for consultation to help clarify if there is any need for concern without having to identify the child. If the consultation process concludes a child has suffered, or is likely to suffer, significant harm, the Social Services Department will then probably request details of the child in order to make further enquiries to assess if any formal action should be taken.

If there are concerns that a child is at risk of being drawn into terrorism the Channel Guidance should also be consulted <https://www.gov.uk/government/publications/channel-guidance>.

Other welfare issues such as bullying, pregnancy, substance misuse and inappropriate sexual behaviour may be associated with child protection matters. If in doubt staff should refer their concerns to the DSL who will initiate further consultation as appropriate. It is the duty of all staff to assist a child in need including making a referral to social services if needs be. Any incident or behavioural change that gives cause for concern should be recorded and passed to the DSL so that an assessment can be made as to whether to access early help.

FGM

All staff must speak to the DSL about any concerns, but if a teacher discovers an act of FGM appears to have been carried out on a girl under the age of 18 the teacher must report this to the police.

If a student makes a direct allegation or disclosure:

- Reassure the Student that they have been heard. The young person needs to know what will happen next (as far as the summer programme is concerned) and should not be given any false reassurance that the matter can necessarily be kept confidential between the young person and staff member.
- Allow the child or young person to make the disclosure at their own pace and in their own way.
- Avoid interrupting except to clarify what the child is saying.
- Do not ask leading questions or probe for information that they do not volunteer.
- Use TED Tell (me...), Explain (what...), Describe (what...)
- Inform the DSL.

Kent Designated Officer advice: The summer programme is not an investigative agency and young people should not be physically examined or made to repeat their allegation to too many different people. This is the task of the Social Services Department and, if necessary, the Police.

A bullying incident should be treated as a child protection concern when there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. Abuse by one or more Students against another where the student is suffering or likely to suffer significant harm will be referred to local agencies and it will be assumed that all the students involved are at risk.

Record keeping and preparing evidence

Records should include: child's name, date of birth, the child's normal context e.g. behaviour and attitude, the incident(s) which give rise for concern with date(s) and time(s) and a verbatim record of what the child said. A form is available from the DSL and should be submitted a.s.a.p. and certainly

within 24 hours. If recording bruising/injuries, the position, colour, size, and shape should be indicated on a body map. If evidence takes the form of inappropriate images these must never be printed off or forwarded (as that would constitute distribution).

The record should be dated and signed and forwarded to the DSL, who will retain it in a confidential file stored separately from the student's main Summer Programme file. Good record keeping is essential in ensuring children's ongoing welfare and safety are promoted and monitored. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. The DSL will maintain a file of concerns and child protection records as recommended by Area Children's Officer (Child Protection). It is particularly important in the event of any subsequent prosecution or formal enquiry since in exceptional situations a staff member can be called as a witness and records used as evidence in a court case. All evidence, e.g. mobile phones containing text messages, laptops, and clothing must be presented.

Referrals

Staff must report to the DSL any concern or allegation about summer programme practices or the behaviour of colleagues which are likely to put Students at risk of abuse or other serious harm. Although responsibility for appropriate action (liaison with LSCB, consultation with Social Services or formal referral as a matter of child protection concern) rests with the Head and the DSL, staff must contact social services or ISI (for boarders) directly, e.g. if they felt it was urgent or they felt that a child protection concern already reported by them to the DSL was not being addressed, according to the normal summer programme whistle blowing policy. Referrals must be made within 24 hours, but 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 must follow up any referrals, escalating if the response seems inadequate: If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point.

Allegations of Misconduct by Student, Staff, or Volunteers

All allegations must be reported straight away to the DSL. If an allegation is against a student, member of staff or volunteer there should be immediate consideration by the Head with the DSL as to how to proceed, taking advice from Local Area Designated Officer immediately. A referral must be made within twenty-four hours. Where the allegation is against the DSL the Head would take over. An allegation against the Head, should be directed to the Chair of Governors, or the designated Safeguarding Governor, without informing the Head. In the absence of the Head, the Senior Deputy Head would take over, and inform the Chair of Governors. Discussions should be recorded in writing, communications with the student(s) and parents, agreed and a decision taken as to whether suspension is appropriate. Every attempt must be made to maintain confidentiality and guard against unwanted publicity.

The Summer Programmes would follow the latest statutory guidance in KCSIE Part Four including: Suspension pending investigation would not be automatic; a decision would be made in each individual case. If a member of boarding staff were suspended alternative arrangements for their accommodation would be made. Allegations found to be malicious would be removed from personnel records. Disciplinary action against Student(s) making malicious allegations would be considered. Records of all other allegations would be kept but any that are not substantiated, are unfounded or malicious should not be referred to in employer references.

The Summer Programmes have a legal duty to refer to the DBS, PO Box 181, Darlington DL1 9FA: 01325 953 795 anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been

removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Compromise agreements cannot apply in this connection. Referrals should be made as soon as possible after the resignation or removal of the individual. After such a referral has been made to the DBS regarding any professional misconduct, consideration must also be given as to whether to refer the case to the Secretary of State (via the Teaching Regulation Agency). Where a dismissal does not reach the threshold for DBS referral, separate consideration must be given to a TRA referral.

<https://www.gov.uk/teacher-misconduct-regulating-the-teaching-profession>.

Code of Conduct

It is the contractual duty of every member of the Summer School programme to observe the following rules and to behave at all times in a reasonable and respectful way towards staff, governors, contractors, visitors, volunteers, Students and their parents or guardians. A breach of these rules by staff will be treated as misconduct and a breach of contract and will be liable to disciplinary action, up to and including dismissal. All staff will work within the law.

Child Protection

The protection of children at the summer programme is of paramount importance and all staff and volunteers are expected to behave in an appropriate manner towards Students and other young adults on site, which will safeguard them against harm, including those over 18. It is an offence to have a sexual relationship with a student under 18, even if the student is over 16 and consents. Any sexual relationship with any current student would lead to dismissal/termination of the volunteer's role at the summer programme. Any concerns, including about the behaviour of a member of staff or volunteer, must be reported to the Designated Safeguarding Lead.

Professional Boundaries

It is important that Students can talk to staff in confidence, but staff should be alert to potential risks in situations where they are in consultation with individuals. The following should enable children to be safe from harm and adults protected from false allegations or misunderstandings:

- Treat Students with respect and dignity.
- Do not touch children in an inappropriate or intrusive manner. If a child is distressed a hug might be appropriate, but only in a public place or with other people present. If demonstrating, e.g. in Music, PE or Drama, always ask a student's permission if it would be helpful to touch them.
- One-to-one meetings should, whenever possible, take place in public or semi-public places. Avoid meeting in otherwise empty buildings, especially in the evenings or at weekends. If in doubt, leave the door open or let a colleague know that you are there.
- Do not invite Students to your own home unless your child is a student and other Students attend your home as their friends.
- Do not allow abusive peer activities, e.g. bullying or initiation ceremonies.
- Do not use physical punishment to control or discipline children.
- Try to avoid giving lifts in a car to an individual; if unavoidable tell a colleague.
- Use e-mail contact with Students for professional purposes only; only use summer programme e-mail. Do not allow Students to join your Facebook pages.
- Do not take a student alone to a pub, restaurant, theatre or other meeting place outside the summer programme. In circumstances where such a meeting is appropriate or essential, let a colleague know what you are doing. Thus, for instance, a coffee in town during a free period

with a sixth former to discuss an exchange is a very different proposition from taking the same sixth former out to dinner in the evening.

In Boarding / Residential situations:

- If visiting Students in their rooms for any length of time doors should be propped open.
- Respect privacy in showers, toilets and changing rooms.
- Avoid being alone with an individual Student.
- Students must not enter any part of staff accommodation without the express permission of a member of staff, and, with the exception of babysitting, the student must not enter unless the member of boarding staff is there. Even with permission, care must be taken as to what is appropriate. For example, welcoming groups of boarders into a sitting room can help create a homely atmosphere, while individual meetings should normally take place in the BHM or matron's study. Entering the bedroom of a member of staff is never appropriate, and venturing beyond a kitchen, dining or sitting room would only be acceptable in the case of babysitting. Students must always use bathrooms in the boarding house, not in staff accommodation.
- Students babysitting may need to enter a child's bedroom, but only when the child is there. A Student must not enter a staff member's bedroom.

If a child makes inappropriate verbal or physical approaches to you:

- Tell the child it is inappropriate.
- Tell the DSL, however embarrassing.
- Record the incident.

Sharing Concerns

If a staff or volunteer has a concern about the behaviour of another staff member or volunteer towards or around children, including that they are not following the above rules of behaviour, s/he should share this concern with the Designated Safeguarding Lead.

Recruitment, selection and disclosures policy

Sevenoaks School Summer Programme is committed to ensuring the best possible environment for the children and young people in its care. Safeguarding and promoting the welfare of children and young people is our highest priority. The Summer Programme aims to recruit staff that share and understand our commitment and to ensure that no job applicant is treated unfairly by reason of a protected characteristic as defined within the Equality Act 2010.

Application Form

The summer programme will only accept applications from candidates completing the relevant Application Form in full. CVs will not be accepted in substitution for completed Application Forms although they may be submitted as extra information. The summer programme will make candidates aware that all posts in the programme involve some degree of responsibility for safeguarding children, although the extent of that responsibility will vary according to the nature of the post. It is therefore important that applicants provide the summer programme with legally accurate answers.

Please see below for details on declaring any unspent convictions, cautions, reprimands or warnings as the successful applicant will be required to complete an Enhanced Disclosure from the Disclosure and Barring Service ("DBS") for the position. If the candidate is currently working with children, on

either a paid or voluntary basis, the Summer Programme will ask their current employer about disciplinary offences, including disciplinary offences relating to children or young persons (whether the disciplinary sanction is current or time expired), and whether the candidate has been the subject of any child protection allegations or concerns and if so the outcome of any enquiry or disciplinary procedure. If the candidate is not currently working with children but has done so in the past, the summer programme will ask the relevant previous employer about those issues. Where neither the current nor previous employment has involved working with children, the summer programme will still ask the current employer about the candidate's suitability to work with children. Where the candidate has no previous employment history, the Sevenoaks School Summer Programme may request character references which may include references from the candidate's school or university.

All candidates should be aware that provision of false information is an offence and could result in the application being rejected or summary dismissal by the Summer Programme if they have been appointed, and a possible referral to the police and/or DBS.

Invitation to Interview

The Summer Programme will short list applicants according to the relevance and applicability of their professional attributes and personal qualities to the role. Short-listed applicants will then be invited to attend a formal interview at which his/her relevant skills and experience will be discussed in more detail. The Summer Programme reserves the right to research candidates' on-line presence before and after shortlisting and to use this information in making decisions around inviting to interview and/or making a job offer.

The interviewers involved will be required to state any prior personal relationship or knowledge of any of the candidates and a judgement will be made by the Course Director as to whether or not an interviewer should withdraw from the panel. The interview will be conducted in person and the areas which it will explore will include suitability to work with children.

All candidates invited to interview must bring documents confirming any educational and professional qualifications that are necessary or relevant for the post (e.g. the original or certified copy of certificates, diplomas etc). Where originals or certified copies are not available for the successful candidate, written confirmation of the relevant qualifications must be obtained by the candidate from the awarding body.

The Summer Programme requires that all candidates invited to interview bring with them originals (not photocopies) of the following documents:

- full birth certificate
- passport
- examination certificates and diplomas
- current driving licence (old style or counterpart driving licence if new credit card style licence)
- change of name documentation, if applicable
- details of any addresses other than the current, lived in within the last five years
- current (within 3 months) financial statement or utilities bill to confirm applicant's address
- Where appropriate any documentation evidencing a change of name;
- proof of entitlement to work and reside in the UK.

Candidates with a disability who are invited to interview should inform the Summer Programme of any necessary reasonable adjustments or arrangements to assist them in attending the interview.

It must never be assumed that information provided by candidates is correct. The checks noted in this policy are the minimum level of checks that should be carried out. Where any doubt or suspicion is held, exhaustive checks should be undertaken until the interviewer is entirely happy that all details have been verified as accurate.

The applicant must be told that the position for which they are applying is exempt from the provisions of the Rehabilitation of Offenders Act 1974 and that a disclosure at the enhanced level from the Disclosure and Barring Service will be applied for and that checks with the Protection of Vulnerable Children List will be carried out.

A member of the interview panel, normally the Course Director must establish that the details on the application form and C.V. are correct.

If the awarding body for certificates or diplomas is unknown to the interviewer or if the interviewer has any doubts, adequate checks should be made to ensure the veracity of such documents. The interviewer will note any motoring offences listed on the driving licence and take photocopies of all documents, which they will sign and date, before returning the originals to the applicant.

Any gaps in the C.V. must be thoroughly investigated. The applicant must be able to give satisfactory explanations. Exact dates should be established. It must not be assumed that an employment said to have ended in, say, 1980 and a new employment said to have started in the same year were coincidental. Reasons for leaving previous posts should also be explained and given satisfactory explanations.

A member of the HR team will request any names that the applicant uses or has used and will conduct an online search of publicly available information on the applicant. Any information found considered relevant to their suitability for working with children will be shared with the interview panel who may explore the information further with the applicant at interview.

Conditional Offer of Appointment: Pre-Appointment Checks

Any offer to a successful candidate will be conditional upon:

- Receipt of at least two satisfactory references (if these have not already been received);
- Verification of identity and qualifications including, where appropriate, evidence of the right to work in the UK;
- A satisfactory enhanced DBS check and a check of the Barred List maintained by the DBS;
- For a candidate to be employed as a teacher, a check that the candidate is not subject to a prohibition order issued by the Secretary of State;
- Verification of professional qualifications, where appropriate;
- Verification of successful completion of statutory induction period (for teaching posts - applies to those who obtained QTS after 7 May 1999);
- Where the successful candidate has worked or been resident overseas such checks and confirmations as the Summer Programme may consider appropriate so that any relevant events that occurred outside the UK can be considered; and
- Satisfactory medical fitness.

Note: - The Summer Programme will normally make the DBS checks no more than three working months before the start date. If the disclosure is delayed, the member of staff can begin work subject to the latest ISI Regulatory Guidance.

References

Written references must be obtained from the candidate's previous employer(s) or college and from at least one personal referee. The current or most recent employer(s) must be asked to provide dates of employment which should be checked against the information provided by the candidate. Referees are required to state whether applicants are suitable to work with children.

The previous employer should be contacted by telephone to establish if there is anything they may wish to say about the candidate that they would prefer not to put in writing. This is the minimum requirement. Additional telephone calls to other referees/previous employers should be made where any doubt exists.

The Summer Programme will compare any information provided by the referee with that provided by the candidate on the Application Form. Any inconsistencies will be discussed with the candidate either at, or after the interview, depending upon the time in which the conflicting information is received.

Policy on the Recruitment of Ex-Offenders

The Summer programme will not unfairly discriminate against any candidate for employment on the basis of conviction or other details revealed, as it makes its appointment decisions on the basis of merit and ability. As a result, if an individual has a criminal record this will not automatically bar him/her from employment within the Summer Programme, but each case will be decided on its merits in accordance with the objective assessment criteria set out below.

All candidates should be aware that provision of false information is an offence and could result in the application being rejected or summary dismissal if they have been appointed, and a possible referral to the police and/or the DBS.

Under the relevant legislation, it is unlawful for the Summer Programme to employ anyone who is included on the lists maintained by the DBS of individuals who are considered unsuitable to work with children. In addition, it will also be unlawful for the Summer Programme to employ anyone who is the subject of a disqualifying order made on being convicted or charged with the following offences against children: murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence.

It is a criminal offence for any person who is disqualified from working with children to attempt to apply for a position within the Summer Programme. The Summer Programme will report the matter to the Police and/or the DBS if:

- the Summer programme receives an application from a disqualified person;
- is provided with false information in, or in support of an applicant's application; or
- the Summer Programme has serious concerns about an applicant's suitability to work with children.

In the event that relevant information (whether in relation to previous convictions or otherwise) is volunteered by an applicant during the recruitment process or obtained through a disclosure check, the Summer programme will consider the following factors before reaching a recruitment decision:

- whether the conviction or other matter revealed is relevant to the position in question;
- the seriousness of any offence or other matter revealed;
- the length of time since the offence or other matter occurred;

- whether the applicant has a pattern of offending behaviour or other relevant matters;
- whether the applicant's circumstances have changed since the offending behaviour or other relevant matters; and
- the circumstances surrounding the offence and the explanation(s) offered by the convicted person.

If the post involves regular contact with children, it is the Summer Programme's normal policy to consider it a high risk to employ anyone who has been convicted at any time of any the following offences: murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence, serious class-A drug related offences, robbery, burglary, theft, deception or fraud.

If the post involves access to money or budget responsibility, it is the Summer Programme's normal policy to consider it a high risk to employ anyone who has been convicted at any time of robbery, burglary, theft, deception or fraud.

If the post involves some driving responsibilities, it is the Summer Programme's normal policy to consider it a high risk to employ anyone who has been convicted of drink-driving.

Retention and Security of Records

The Summer Programme will comply with its obligations regarding the retention and security of records in accordance with the DBS Code of Practice and its obligations under its Data Protection Policy. Copies of DBS certificates will not be retained for longer than 6 months.

Sevenoaks School Summer Programme Visitors

Normally visitors, including celebrities, would not have access to individual Students and should be escorted by a member of staff at all times. Visitors to the Summer Programme must be told in advance to report to Manor House, where they will sign in and out. They will be issued with a temporary pass which they must wear, and car details recorded. They will be escorted by their host or a tour guide.

Contact Details

Holiday Programmes DSL – Mrs Kari Quant – Director of Summer Programmes

Sevenoaks School DSL – Mr Jonathan Lidiard – Deputy Head Pastoral

Local Safeguarding Children Board For urgent child protection issues, please call the Integrated Front Door: 03000 411111 (out of hours number: 03000 419191)

For early help, see Early Help and Preventative Services: <https://www.kent.gov.uk/education-and-children/early-help-support-forfamilies#tab-2>

Central Referral Unit: Kroner House, Ashford Tel: 0300 3335647

Area Safeguarding Advisor for North Kent: Worrall House (Dartford, Gravesham, Sevenoaks) 30 Kings Hill Avenue, West Malling ME19 4AE Office: 03000 412445

LADO Team contact number: 03000 410888

Social Services: The Willows, Hilda May Avenue, Swanley BR8 7BY Tel: 01322 6110000

Social Services 24/7: Tel: 0300 333 5433

www.kcpc.org.uk (Kent Child Protection Committee)

Independent Schools Inspectorate: CAP House, 9-12 Long Lane, London, EC1A 9HA

DfE contacts re extremism: Tel: 020 7340 7264 counter.extremism@education.gsi.gov.uk.

Kent Police: Tel: 01622 690690 or 101

The NSPCC *what you can do to report abuse* dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday or email: help@nspcc.org.uk.

Actions where there are concerns about a child

