

Safeguarding Policy

This policy applies to:

1. BCAA Whole College

Policy owner:	Melanie Rackham and Victoria Shillingford
Frequency of review:	At least annually, or whenever Government updates require it
Dates of previous review:	August 2021
Date of current review:	September 2022
Date of next formal review:	August 2023
Linked policies/documents:	E-Safety Policy, Missing Child Policy, Anti-bullying Policy
Comments:	

INTRODUCTION, SCOPE, PERSONNEL

Safeguarding and promoting the welfare of children are defined for statutory purposes as: protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

The core safeguarding principles of Brighton College Al Ain, referred hereafter to as the 'School', are:

- a. It is the responsibility of the School to safeguard and actively promote the welfare of children;
- b. Children who are and feel safe make more successful learners.

The Safeguarding and Child Protection Policy, together with the effectiveness of its implementation, is reviewed annually by the Governing Body, unless an incident or new legislation or guidance suggests the need for an earlier date of review.

This policy (which includes all sections and all of the appendices in this document) is one of a series in the School's integrated safeguarding portfolio. This policy has been authorised by the Board of Governors, is addressed to all members of staff and volunteers, is available to parents on request and is published on the School website. It applies wherever staff or volunteers are working with pupils even where this is away from the School, for example at an activity centre or on an educational visit.

This policy has been developed in accordance with the principles established by the Education and Skills Act 2008, the Children Acts 1989 and 2004, the Children and Social Work Act 2017 and the Childcare Act 2006; the Education (Independent School Standards) Regulations 2014, the National Minimum Standards for Boarding Schools and the Early Years Foundation Stage Statutory Framework; and in line with government publications: Working Together to Safeguard Children (July 2018), Keeping Children Safe in Education (September 2022) (KCSIE) and the This policy also takes into account further statutory guidance applicable to the School comprising:

- Disqualification under the Childcare Act 2006 (DfE, August 2018)
- Revised Prevent duty guidance for England and Wales (HM Government, July 2015)
- Channel duty guidance: protecting vulnerable people from being drawn into terrorism (HM Government, April 2015)
- Multi-agency statutory guidance on female genital mutilation (HM Government, July 2020)
- What to do if you're worried a child is being abused: advice for practitioners (HM Government, March 2015)
- Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (HM Government, July 2018)
- Sexting in schools and colleges: responding to incidents and safeguarding young people (UK Council for Child Internet Safety (UKCCIS), August 2016)
- Children missing education (DfE, September 2016)
- Child sexual exploitation: definition and a guide for practitioners local leaders and decision makers working to protect children from child sexual exploitation (DfE, February 2017)
- Sexual violence and sexual harassment between children in schools and colleges, Advice for governing bodies, proprietors, headteachers, principals, senior leadership teams and designated safeguarding leads (May 2018)
- Teaching Online Safety in Schools (June 2019)
- Safeguarding children and protecting professionals in early years settings: online safety considerations (UKCCIS, February 2019)
- Relationships education, relationships and sex education and health education guidance (DfE, June 2019)
- Guidance for full opening: schools (DfE, updated throughout 2020)

In this policy, the Head refers to the Head Master of Brighton College Al Ain, (or Head of Senior and Junior Schools who deputises in all things for the Head Master. 'DSL' refers to the 'Designated Safeguarding Lead'.

In ensuring this policy is put into practice in the College, where one of the the DSLs is unavailable, one of the other DSLs will be contacted in the first instance, acting to fulfil the responsibilities and roles outlined below.

Policy Statement, Principles and Aims

Policy Statement

The protection and welfare of pupils at Brighton College is of paramount importance. Children and parents have a right to expect the school to provide a safe and secure environment and the school has a general duty for children's welfare as part of its role "in loco parentis". The School recognises its moral and statutory responsibility to safeguard and promote the welfare of all children and create a culture of safety, equality and protection. We endeavour to provide a safe and welcoming environment where children are listened to, respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. As a charity, we take steps to ensure that we provide a safe and trusted environment and protect people who come into contact with us from harm.

Principles

The School's Commitment to Safeguarding

The School is committed to safeguarding and promoting the welfare of children and young people and expects all staff to share this commitment so as to create an open environment where staff and pupils feel able to raise concerns, and where concerns will be listened to with a readiness to involve support services and other agencies as necessary:

- The school will ensure that the welfare of children is given paramount consideration when developing and delivering all school activities;
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection: to feel safe, secure, valued and respected, and feel confident, and know how to approach adults if they are in difficulties;
- All staff, including the Head, are responsible for safeguarding the welfare of children as part of their professional duties;
- Indeed, everyone who comes into contact with children and their families and carers has a role to play in safeguarding children;
- No single professional can have a full picture of a child's needs and circumstances; everyone who comes into contact with the child and their family has a role to play, therefore;
- All staff have an equal responsibility to act, in accordance with this policy and procedures and KCSIE, on any suspicion, concern or disclosure that may suggest a child is in need of support services or is at risk of harm; the full version of KCSIE is available to all staff via the School intranet;
- The safety of a child is of the utmost importance, overriding any additional concerns, for example, relating to data protection or fears of sharing information;
- The school plays a key role because staff are in a position to identify concerns early, provide help for children and prevent concerns from escalating.

The Best Interests of the Child

A child's wishes or feelings will be taken into account when determining what action to take and what services to provide to protect them; children will be given the opportunity to express their views and give feedback wherever possible. Paramount in all dealings should be asking what is in the best interests of the child.

Safer Recruitment

The School is committed to operating safer recruitment procedures in compliance with relevant legislation and guidance and in accordance with the School's Safer Recruitment policy; where staff from another organisation are working with pupils on another site, the School will have received written confirmation that appropriate child protection checks and procedures have been carried out on those staff.

Appropriate Support and Training

All pupils and staff involved in child protection issues will receive appropriate support from the Senior Leaders of the School who will follow this policy guidance and statutory guidance in all that they do.

Multi-agency work

The DSLs work closely in partnership with other Brighton College and Abu Dhabi schools to ensure that the School follows relevant local arrangements at all times.

The school will work with other agencies wherever such work is needed to ensure adequate arrangements to identify, assess and support those children who are suffering harm or who may suffer harm without appropriate intervention. The school will work with ADEK, MOE, HAAD, the police, health and other services to promote the welfare of children and to protect them from harm. This may include a contribution to Early Help and contributing to multi-agency plans to provide additional support to those children subject to child protection plans or deemed 'Children in Need'. The school understands its duty to work with the local authority to support assessments made of children in need as set out in KCSIE.

The School recognises and understands the important role it plays in the wider safeguarding system, particularly in relation to Early Help and initial support given to the pupils to ensure that pupils receive the right help at the right time.

Early Help means providing support as soon as a problem emerges at any point in a child's life. It may require staff to support other agencies and professionals in an Early Help Assessment, sharing information in the best interests of the child.

Where requested to do so, the School will allow access for children's social care from ADEK and Child Protection Services. In addition, the School will comply with any request to supply information to ADEK and CPS that it requires in order for it to perform its functions.

The School understands the importance of all involved in supporting children and families sharing information and taking prompt action.

'It Could Happen Here'

This is a vital principle underpinning all training and approaches to safeguarding at Brighton College.

Aims of this policy

The aims of this policy are as follows:

- to actively promote and safeguard the welfare of children, staff and others who come into contact with the College and to protect them from harm, thereby fostering a culture of safety, equality and protection;
- to have clear procedures in place for dealing with and referring concerns about a pupil's welfare and allegations of abuse;
- to raise the awareness of all those within the School communities who come into contact with children, including Governors, Head, staff and volunteers of their responsibilities to safeguard children and to report concerns;
- to ensure consistent good safeguarding practice throughout the School.

Framework for the policy

This policy has been written in accordance with MOE, ADEK and HAAD statutory guidance as well as locally agreed procedures (Abu Dhabi) and is available on the School website.

There are five main elements:

- Establishing a safe environment in which children can learn and develop and which protects all those who come into contact with the School from harm.
- Raising awareness of child protection issues and equipping children with the skills needed to keep them safe.
- Ensuring 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 or likely cases of abuse, neglect or harm.
- In accordance with his/her agreed child protection plan, supporting pupils who have been abused.

Key Personnel

The Safeguarding Team at Brighton College

Oliver Bromley-Hall (Deputy Head Master and DSL), as the Designated Safeguarding Lead, has lead responsibility for safeguarding and child protection (including online safety). Whilst the activities of the designated safeguarding lead can be delegated to the other DSLs, the ultimate lead responsibility for safeguarding and child protection (including online safety) remains with the designated safeguarding lead.

The College Safeguarding team comprises Ms Melanie Rackham (Deputy Head, Pastoral (JS) and DSL) and Mrs Victoria Shillingford (Assistant Head (SS) and DSL. The College Safeguarding team meets every other week for Pastoral and Safeguarding meetings, alongside members of CLT and the Counsellor, Mrs Hayley Goodenough.

The DSL is the first point of contact for all staff; he keeps the central file, manages CPoms and registers categories of pupils. The DSLs communicate with Children's Services locally, with whom they are able to build up strong contacts; the DSLs always meet to discuss any contact like this. Both may handle any communication with the Police. In the event of multi-agency meetings or meetings with the Police, the DSLs will always aim to attend together.

Awareness:

Pupils are made aware of the Designated Safeguarding Leads' names through prominent signs in the Junior School and Senior School, as well as during relevant Pastoral sessions and assemblies.

The Safeguarding Team Visual is displayed in departmental offices, College Housemaster / Housemistresses' offices, staff rooms in both Schools and in support staff offices. It is updated at least annually, or whenever a change requires it to be amended.

ROLES AND RESPONSIBILITIES AT BRIGHTON COLLEGE

Roles and responsibilities in Managing Safeguarding and Child Protection

All Staff

All staff, which includes the Head, all Governors, teaching and support staff, including temporary staff and all volunteers who do not fall under visitor procedures, (hereafter 'staff'), have a statutory responsibility to:

- Have read this Safeguarding policy, including the safeguarding response to children missing from education;

- Have read at least part one of Keeping Children Safe in Education (September 2022) and Annex A of KCSIE;
- Have read the School's Behaviour policy and the staff Code of Conduct;
- Understand the role of the DSL and be able to identify the DSL and Deputy DSLs and work with them and, if required, to support social workers to take decisions about individual children;
- Provide a safe environment in which children can learn;
- Be aware of systems, policies and procedures within the School which support safeguarding;
- Be aware of the indicators of abuse and neglect so that they are able to identify children who may be in need of extra help or who are suffering, or are likely to suffer, harm and in such circumstances to take appropriate action, working with other services as needed;
- Attend appropriate safeguarding and child protection training on appointment and subsequent refresher training at least annually; this will be facilitated by the DSLs, Educare and National Online Safety (NOS)
- Make a direct referral to a DSL immediately if, at any point, there is a risk of immediate serious harm or if the child is suffering harm;
- Expect to support the DSLs, ADEK, Child Protection Services and other agencies following any referral;
- Be prepared to identify children who may benefit from Early Help. Early Help means providing support as soon as a problem emerges at any point in a child's life;
- Staff should keep in mind that cases should be kept under review and consideration given to a referral for assessment if the child's situation does not appear to be improving or is getting worse – staff should follow local escalation procedures to ensure concerns have been addressed and most importantly that the child's situation improves.

Staff should not assume that a colleague or another professional will take action, and should be mindful that early information sharing is vital for effective support being put in place.

Designated Safeguarding Governor/s

Responsibilities will include:

- Initiating an annual audit of safeguarding procedures in the respective Colleges
- Ensuring safe recruitment processes are fully embedded in the Colleges
- Ensuring appropriate e-safety technologies, monitors and filters are maintained in all Colleges through Bloom HQ
- In line with KCSIE and Working Together to Safeguard Children, a member of the Governing Body and a reserve are nominated by the full Governing Body to: have oversight of safeguarding matters; be available to liaise with the local authority and/or partner agencies on issues of child protection; instigate the annual review of Safeguarding Policies in each College
- Reporting any serious incident that has resulted or could result in a significant loss of funds or a significant risk to the School's property, work, beneficiaries or reputation to the board of Bloom, National Holdings and the respective Head Masters immediately, including any suspicions, allegations or incidents of abuse or mistreatment of vulnerable beneficiaries. In particular, if a serious safeguarding risk materialises.

Designated Safeguarding Leads

The DSLs are most likely to have a complete safeguarding picture and be the most appropriate persons to advise on the response to safeguarding concerns.

The broad areas of responsibility for each of the DSLs are as follows and taken from Appendix B of KCSIE; should the College DSL be unavailable, the Head Master, Head of Senior and Head of Junior Schools will fulfil these roles in the first instance.

The DSLs should always be available to discuss safeguarding concerns. If the DSLs are not available, this should not delay appropriate action being taken. Holiday-time cover is agreed among the DSL and Deputies. If for any reason they are not contactable, staff may speak to a member of the College Leadership Team (CLT) who are Level 2 and 3 Safeguarding trained, and/or take advice from local children's services; in these circumstances, any action taken should be shared with the DSL as soon as is practically possible.

Managing referrals

The DSL will:

- Ensure all cases of suspected abuse are reported to:
 - the local authority's Child Protection Services:
 - Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child) and/or
 - Police (cases where a crime may have been committed; for guidance consult
- Liaise with the Head, as appropriate, to inform him of safeguarding issues especially ongoing enquiries under Section 47 of the Children Act 1989 and police investigations.
- With the other DSLs, 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.
- Keep written records of concerns, discussions, decisions and reasons for decisions taken.
- Contact pupils' previous schools to request safeguarding information.

Training requirements: DSL and Deputy DSLs

The DSLs will receive updated training carried out at least every two years, but maintain up-to-date understanding at least annually, in order to:

- Understand the assessment process for providing Early Help and intervention, for example through locally agreed common and shared assessment processes such as Early Help assessments.
- Have a working knowledge of locally agreed procedures for child protection and multi-agency working, in particular, 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.

Ensure each member of staff has access to and understands the School's Safeguarding and Child Protection Policy and procedures and the staff Code of Conduct, especially new and part time staff.

- Be alert to and support the specific needs of children in need, those with special educational needs and young carers.
- Understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up-to-date capability required to keep children safe whilst they are online at School.
- Recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online.
- Be able to keep detailed, accurate, secure written records of concerns and referrals.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them.

The DSLs from both Schools receive regular updates on safeguarding from ADEK, the MOE and from external providers.

Note: When a new DSL is appointed, they will not take sole responsibility for a case until they have undertaken the required training.

Training of Staff

The DSL will ensure that:

- all staff have received the required initial and annual safeguarding training (the content of which will be in line with local procedures and expectations) and have signed to indicate that they have read and understood this safeguarding policy (including safeguarding response to children missing education), the Behaviour policy, the Code of Conduct (which includes detail of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with pupils) and Part One and Annex A of KCSIE and that they know who the DSL is;
- all staff receive training to enable them to fulfil their responsibilities listed above, the importance of sharing information, making a referral themselves and finding guidance on how to do this, as well as the role they might be expected to play in any assessment;
- all staff know what to do if a child tells them he/she is being abused/neglected, including maintaining an appropriate level of confidentiality and only involving those who need to be involved;
- all staff are re-trained as and when required and that an accurate record of staff attendance of induction and refresher training is maintained.
- all staff complete a safeguarding questionnaire/ online NOS course, at least annually to demonstrate understanding of the core components of KCSIE and the School's safeguarding policy
- staff are given the chance to provide feedback or ideas relating to the safeguarding at Brighton College
- all staff receive safeguarding and child protection updates (for example via email and staff meetings) as required, and at least annually.

Raising Awareness

The DSL will ensure the School's policies are known and used appropriately. Together the DSLs will:

- Ensure the School's Safeguarding and Child Protection Policy and the staff Code of Conduct are reviewed annually and that procedures and implementation are updated and reviewed regularly in light of changes in local procedures and national statutory requirements and guidance, and work with the Governing Body regarding this.
- Provide Safeguarding updates and reminders at briefings/staff meetings.
- Ensure that all staff complete an annual Safeguarding questionnaire to assess understanding of the School's policy and practice.
- Carry out an annual 'audit' of School procedures in liaison with safeguarding representatives.
- Ensure the Safeguarding and Child Protection Policy is available publicly (through the School website) and parents are aware of the fact that referrals about suspected abuse or neglect must be made and the role of the School in this.
- Where children leave the School, ensure their child protection file is transferred to the new school or college as soon as possible but transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt and where appropriate, that the child's social worker is informed.
- Consider whether it would be appropriate to share any information with the new school in advance of a child beginning at their new school, for example, information that would allow the new school to continue supporting victims of abuse and have support in place for when they arrive.
- Promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues with teachers and school College Leadership Team (CLT).

In addition to the above responsibilities as set out in KCSIE, the DSL will:

- Consider how children may be taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum, for example through Information and Communications Technology (ICT), Pastoral Times and/or Moral Education (ME).
- Ensure appropriate safeguarding responses are in place and are implemented to deal with pupils who go

missing from the School, in particular any pupils who go missing on repeat occasions.

- Understand safer recruitment procedures and processes and be able to apply them as a member of an appointment panel.
- Liaise with other agencies that support the pupil such as Social Services, Child and Adolescent Mental Health Services, ADEK, MOE and HAAD.

Record Keeping

The DSLs will ensure all staff are aware of how to raise a concern using CPoms and the official BCAA referral document. This includes ensuring staff feel confident to raise a concern and that appropriate staff are able to update a concern, noting concerns, decisions made and the reasons for those decisions. All Child Protection records will be securely stored in a central location with the DSL.

The Head

The Head will:

- Ensure that the safeguarding and child protection policy and procedures adopted by the governing body are implemented and followed by all staff;
- Allocate sufficient time and resources to enable the DSLs to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings;
- Ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively. Reporting wrongdoing by staff in the workplace, whether or not it involves the safeguarding and welfare of children, is dealt with in accordance with the School's Whistleblowing procedures;
- Provide immunity from retribution or disciplinary action against staff in the event of them 'whistleblowing' in good faith.
- Ensure that children's safety and welfare are addressed through the curriculum.
- Be able to understand safer recruitment procedures and processes and deal with allegations made against members of staff and volunteers.

Safeguarding Guidelines for all

To meet and maintain our responsibilities towards children, all members of the School community (staff, governors, pupils and parents) are expected to adhere to the following standards of good practice:

- In addition to the stated requirements in section 2.1 of this policy, when circumstances require, to read and understand the School's safeguarding and guidance documents on wider safeguarding issues in addition to this policy, including: the Code of Conduct, Anti-Bullying, Online Safety Policy, First Aid, SEN Policy, Whistleblowing Code;
- Treating all children with respect;
- Setting a good example by conducting ourselves appropriately;
- Involving children in decision-making which affects them;
- Encouraging positive and safe behaviour among children;
- Being a good listener;
- Being alert to changes in children's behaviour - maintain an attitude of 'it could happen here' where safeguarding is concerned;
- Recognising that challenging behaviour may be an indicator of abuse;
- Asking the child's permission before doing anything for them which is of a physical nature (except where there is an urgent need to take action to protect them or to prevent them from harming others), such as assisting with dressing, physical support during PE or administering first aid;
- Maintaining appropriate standards of conversation and interaction with and between children and avoiding and discouraging the use of inappropriate sexualised or derogatory language;
- Being aware that the personal and family circumstances and lifestyles of some children lead to an increased risk of neglect and/or abuse.
- Be alert to the context in which safeguarding incidents and/or behaviours can occur, including association with factors outside the College. Staff should consider whether wider environmental factors are present

- in a child's life that is a threat to their safety and/or welfare.
- Promoting the School ethos which promotes a positive, supportive and secure environment and gives the pupils a sense of being valued.
- Making clear to all pupils that if they have any problems or worries these can be taken to a class teacher, form tutor, HM, a subject teacher or any member of the management team (in particular, in the College, the Deputy Heads or Assistant Heads. The College nurses, as well as the School Counsellor are also available throughout the School day.
- In the College: enabling a support system where pupils can go to older pupils with responsibility, such as Prefects for peer advice. The vertical House system also provides many opportunities for support among the pupil body and across different year groups. All new pupils at the College are given a mentor from an older year during their first term at the School

AREAS OF SCHOOL LIFE UNDERPINNED BY SAFEGUARDING

Safer Recruitment

The School is committed to safer recruitment and the School's HR department are responsible for implementing these practices. It is clearly understood that the use of recruitment procedures that help deter, reject or identify people who might abuse children is essential. The level of check (prohibition, direction, sanction, restriction) and/or DBS certificate depends on the role that is being offered and the duties involved.

The School carries out the required checks on staff as outlined in Part 3 of KCSIE.

The School must be assured that any staff employed by another organisation and working with Brighton College pupils outside of School premises (for example, in another institution) have undergone relevant safeguarding checks. The School obtains written confirmation from any agency or third party organisation (or alternative provider) that they have carried out the checks on an individual.

This includes a check in addition to DBS checks to ensure that the person is not prohibited from teaching. For those assuming management roles (including internal appointments/promotions), there is a further check under section 128 of the Education and Skills Act 2008, to ensure that managers are not prohibited from teaching, using the Teacher Services system. This includes not only senior managers, but those managing departments or Houses, for example, sometimes referred to as 'middle managers'. Full details are provided in the College's Recruitment and Selection Policy.

From August 2015, those appointed to the Governing Body have also had section 128 checks completed. In response to KCSIE 2019's requirement for all maintained governors to be checked, the entire Governing Body at Brighton College is now 128-checked, including those appointed before August 2015.

Staff who have lived outside the UK undergo the same checks as other staff. In addition, we make any further checks appropriate so that any relevant events that occurred outside the UK can be considered.

Monitoring/Supervising Staff and Volunteers

The School is committed to safer recruitment and ensuring that all necessary and appropriate checks are carried out for staff and volunteers. As part of the recruitment process, all new staff follow a comprehensive induction process which includes a 'Day One Induction' meeting which focuses on safeguarding procedures and information, including online safety.

Clear expectations are set out for all staff (including supply staff) and volunteers in the Code of Conduct which emphasises safeguarding and appropriate behaviour for staff and appropriate supervision for pupils and this is reissued at the start of each academic year to all staff.

The Whistleblowing policy is also highlighted to all staff who may have a concern about the behaviour of a colleague or, more generally, the College's safeguarding practices.

Abuse of Trust and Inappropriate Relationships

All School staff are aware that inappropriate behaviour towards children is unacceptable and that their conduct towards all children must be beyond reproach.

The School's Code of Conduct separately set out expectations of staff.

All staff are aware of the potential for a pupil's relationship with another pupil to be or become abusive and are alert to this possibility and the requirement for concerns of this nature to be referred under the procedures detailed in this policy.

Children who may be at increased risk of harm

Some children may be at increased risk of harm as a result of neglect and/or physical, sexual or emotional abuse.

Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse happens, or who have a high level of tolerance in respect of neglect.

To ensure that all of our children receive equal protection, we will give special consideration and attention to children who are:

Disabled or who have Special Educational Needs:

- who may be particularly vulnerable or for whom additional barriers may exist in recognising or communicating about abuse and neglect.
- assumptions may be made that behaviour, mood or injury may relate to the disability, without exploring the possibility of abuse.
- children with SEN or disabilities may be disproportionately impacted by things like bullying without outwardly showing any signs, or more prone to peer group isolation than other children, making them even more vulnerable.

Complaints about staff

Complaints procedure

The complaints policy and procedure is available to all parents and staff via the School Policies page of the School's website.

Whistleblowing Policy

Complaints from staff involving wrongdoing in the workplace are dealt with under the School's Whistleblowing policy, available on the BCAA website.

Note that where a staff member feels unable to raise an issue with the School, or feels that their genuine concerns are not being addressed, additional whistleblowing channels are open to them, including:

Allegation against a member of staff

The procedure in Appendix 3 entitled Arrangements for Dealing with Allegations against Staff will apply if there is an allegation that a teacher or other member of staff (including supply staff) or volunteer has:

- behaved in a way that has harmed a child, or may have harmed a child;
 - possibly committed a criminal offence against or related to a child;
 - behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children;
- or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (for example, if they have been involved in an incident outside school which did not involve children but could be regarded as relevant to their suitability to work with children).

Appendix 3 gives further information about the School's approach to dealing with allegations against supply staff.

Allegations against former members of staff or volunteers who are no longer teaching should be referred to the police; concerns or suspicions about applicants for positions at the School should be referred to the Head who will refer them to the relevant parties, or in an emergency or in cases of serious harm, directly to the police. Historical (non-recent) allegations of abuse should be referred to the police.

The Head Master of the College should be always informed of allegations made against former members of staff/volunteers who are no longer working at the School.

Training

It is important that all staff have training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern.

All new staff will receive training on appointment as part of their induction, overseen by the DSL. The training, which is updated regularly based on BHSCP advice, includes:

- this policy, including the safeguarding response to children missing education;
- the staff Code of Conduct including whistleblowing, acceptable use of IT and staff/pupil relationships;
- online safety;
- the identity of the DSLs;
- a copy of Part One and Annex A of KCSIE;
- the relevant School's Behaviour policy.

All staff will be required to sign to confirm they have read, understood and agreed to comply with the requirements outlined in these documents. Whenever induction training is completed, all attending staff sign their attendance, which allows a log of the induction training to be kept by HR on the Single Central Register.

All staff will receive safeguarding and child protection training that is updated annually in accordance with the latest UAE and UK guidance. Such training, when arranged, takes priority over all other commitments.

Staff are trained to manage a report of child on child sexual violence and sexual harassment in accordance with Part 5 of KCSIE.

A register will be taken at each safeguarding and child protection training session. This will be sent to the School's HR Department who will collate all lists and keep a register of the training completed. The DSLs will arrange suitable times to hold the necessary training. In order to assess understanding, each member of staff will subsequently complete a questionnaire and the DSL will follow up if a need for further training or clarification which is highlighted.

The DSLs will receive updated training at least every two years, including training in multi-agency working, participation in child protection case conferences, supporting children in need, record keeping and promoting a culture of listening to children, and safer recruitment. Such training, when arranged, takes priority over all other commitments. The DSLs will also regularly keep abreast of developments and updates, for example, by receiving email notifications and alerts from the government and training providers.

In addition to internal training, all staff in regular contact with pupils will receive online Safeguarding training through National Online Safety (NOS) and Educare.

In addition, all College Senior School Prefects (including House Prefects) and peer mentors receive safeguarding and child protection training at the start of the academic year provided by the DSL.

All training will be carried out in accordance with ADEK, MOE and relevant UK procedures and requirements.

Health & Safety, Extended School Activities and Educational Visits

The School's Health & Safety and Educational Visits policies are set out in separate documents, and reflect the consideration given to the protection of our children both physically within the School environment and away from the School when undertaking School trips and visits. Approval for all trips must be granted by ADEK and the process of approval is managed by Oliver Bromley Hall. Procedures for requesting a trip are outlined in the Educational Trips & Visits Policy.

Where extended School activities are provided by and managed by the School, our own Safeguarding and Child Protection Policy and procedures apply. Where other organisations provide services or activities on our site the member of the School's staff responsible for arranging the services activities will check with Oliver Bromley Hall that the service or activity providers have ADEK approval, appropriate procedures in place, including relevant risk assessments and safer recruitment procedures.

When our children attend off-site activities, including those abroad on School trips, in liaison with Oliver Bromley Hall, we will check that effective child protection arrangements are in place. All staff are bound by ADEK's Educational Visits Policy when arranging and organising off-site trips.

Photography and images

The use of photographic images of pupils in publications is strictly prohibited, unless express permission has been given by the parents. The Admissions Office and Marketing department co-ordinate use of pupil images in accordance with the centrally stored Parental Permission list and data protection law.

Taking and publishing photographs of children without parental consent is a criminal offence in the UAE, punishable by law. All staff have a responsibility to adhere to this guidance and to remind pupils of the same.

From time to time professional photographers are invited into the School to take group photographs or pictures of significant events; any professional photographers hired by the School will be subject to appropriate vetting checks.

CCTV is located around the School but is not installed in changing rooms, toilet areas or classrooms. CCTV footage can only be accessed after consultation with the DSLs and with express permission from the Head Master.

Pastoral and Safeguarding Education

The School promotes the welfare of children through the Pastoral Curriculum, PSHE, Assembly programme, Moral Education curriculum, the ICT curriculum and parents' forums. Pupils are given the information to avoid situations and persons, including over the internet and mobile technology, which/who could lead them into harm (see section 3.11 below on Online Safety).

Bullying

Bullying is a subset of abuse that can take different forms, including: physical, emotional, verbal, ostracism, homophobic and gender-related bullying and/or cyber bullying (which includes abusive messages posted online or sent by text or email or via other means using technology). The School is determined that no kind of bullying will be tolerated by pupils, parents or staff at the School.

The School's Anti-bullying policy can be found on the Pastoral Google File and is available via the website. All School staff, pupils and parents must be aware that engaging in bullying behaviour or condoning or failing to challenge or report bullying would lead to the application of child protection procedures and in the case of a member of staff being complicit, or otherwise involved, in bullying behaviour, to the application of the procedure in **Appendix 3 (Allegations of abuse)** of this policy.

If there is a concern that a child is at risk of serious harm from bullying behaviour, or that the cause or effect of the bullying leads to the significant impairment of health or development of a child (either alleged perpetrator or victim), the School's Child Protection Procedures will be followed; the Police will be informed in cases of serious harm.

The School's Anti-bullying policy applies to bullying behaviour outside of the School of which the School becomes aware.

Online Safety

The school's approach has been formed with the government guidance 'Teaching Online Safety in Schools' very much in mind.

Most of our children will use mobile devices and computers at some time. They are important tools for communication and education as well as for recreation and socialising. However, we know that some men, women and young people will use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails (cyber-bullying), to enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings.

The School's Code of Conduct and ICT Acceptable Use Policy explain the responsibilities of staff in relation to keeping children safe in school.

Pupils receive guidance on safe use of the web (including anti-bullying) through the ICT and Pastoral curricula and in year group assemblies.

Cyber-bullying by children, via texts, direct messages, social media or email, will be treated as seriously as any other type of bullying and will be managed through our Anti-bullying policy and procedures.

Chat rooms and social networking sites are sources of risk of inappropriate and harmful behaviour in the digital arena. Some children will undoubtedly be 'chatting' on mobile or social networking sites at home. The School runs parent seminars to help parents understand the possible risks. In addition, the School periodically publishes an Online Safety Bulletin for parents.

The School uses appropriate internet filters and monitoring to safeguard pupils from potentially harmful and inappropriate online material. This includes regular consideration to 'over-blocking' to avoid unreasonable restrictions as to what pupils can be taught regarding online teaching and safeguarding.

Secure premises

The School will take all practicable steps to ensure that School premises are as secure as circumstances permit.

The School keeps a visitors' book at Reception. All visitors must sign in on arrival and sign out on departure and are escorted whilst on School premises by a member of staff or appropriately vetted volunteer. All visitors will be given a name badge with the title 'Visitor' which must be clearly displayed and worn at all times whilst on the School premises. Visitors must sign a Child Protection declaration at reception when receiving their badge; this includes the Child Protection contact details on the back for ease and speed of communication. The Security team is vigilant in stopping all visitors who are not known to them. The School manages large events (such as parents' evenings or concerts) differently, locking down areas of School and allowing guests access only to the appropriate venue(s). Senior pupils sometimes take visitors/families for a tour of the School. They have received safeguarding training, must follow a set route which remains in the main public areas of the School, and they are briefed on what to do if anything concerns them during the tour. Pupils in the Junior School are never on their own with visitors if providing a tour, but are accompanied by a teacher.

REVIEW OF POLICY AND PRACTICE

Monitoring and review

This policy is reviewed as part of the annual policy checks by the College Leadership Team, to which the Governors delegate responsibility for making necessary immediate changes. The governing body also annually reviews and confirms efficient enforcement of this policy, and any deficiencies in these arrangements are to be addressed at once. It is the responsibility of both to confirm efficient enforcement review and updates may take place more frequently where necessary, and changes will be highlighted to staff, parents and pupils as appropriate. Any child protection incidents at the School will be followed by a review of the safeguarding procedures within the School and a prompt report to the Governors. Where an incident involves a member of staff, the Head Master and Governors will assist in this review to determine whether any improvements can be made to the School's procedures.

Any deficiencies or weaknesses in regard to child protection arrangements at any time will be remedied without delay and a report made to the Governing Body.

As part of the review process, the College DSLs communicate with ADEK, MOE and BCI to discuss best practice and local authority procedures.

Log of recent reviews

Reviewed by	Date	Change/s
Melanie Rackham	2022	Cpoms, NOS and Educare
Oliver Bromley-Hall	2020	Covid-19 addendum
Oliver Bromley-Hall	2019	None
Oliver Bromley-Hall	2018	Inclusion of KCSIE guidance

SPECIFIC CHILD PROTECTION PROCEDURES

Child Protection Procedures

It is important that a child at risk or in need receives the right help at the right time to address risks and prevent issues escalating. It is therefore important that all staff understand their responsibility to: identify, act on and refer the early indicators of abuse and neglect; keep clear written records; listen to the views of the child; reassess concerns when situations do not improve; share information quickly and challenge inaction.

Recognising abuse

To ensure that children are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

The government document 'What to do if you're worried a child is being abused' (March 2015) can be found [here](#). The NSPCC website also provides very useful additional information on abuse and neglect.

Abuse and neglect are forms of maltreatment. Somebody (adult or child) may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a young or immature child home alone. 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.

It is important to note that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

There are different categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect, as defined in part one of KCSIE and reproduced in Appendix 1 of this policy.

Safeguarding incidents and/or behaviours can be associated with factors outside school and can occur between children outside the school. All staff (especially the DSLs) 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.

Specific safeguarding issues

All staff should have an awareness of safeguarding issues, some of which are listed below. Staff should be aware that behaviours linked to incidents, for example, of drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger.

See below for more information on how other children can harm a child (peer on peer abuse).

When a concern is raised, the Designated Safeguarding Lead will consider whether there has been or is a likelihood of harm and whether there is a need for additional support from one or more agencies; the former will be reported to the Child Protection Services immediately, the latter would lead to multi-agency assessment using the local processes.

Expert and professional organisations provide up-to-date guidance and practical support on specific safeguarding issues. For example NSPCC offers information for schools on the TES website and also at <http://www.nspcc.org.uk>.

Staff can also access Government guidance on the issues listed below via the GOV.UK website:

- bullying including cyberbullying child missing education
- child missing from home or care child sexual exploitation (CSE) children and the court system
- children with family members in prison domestic violence
- drugs
- fabricated or induced illness faith abuse
- female genital mutilation (FGM) Guidance for Schools (Statutory guidance on FGM here) forced marriage
- gangs and youth violence
- gender-based violence / violence against women and girls (VAWG) homelessness
- hate
- honour-based violence (HBV) mental health
- missing children and adults strategy private fostering
- Preventing Radicalisation and The Prevent Duty relationship abuse
- Government publication on sexting in schools and colleges trafficking
- Sexual violence and sexual harassment between children in schools and colleges:
- Advice for governing bodies, proprietors, headteachers, principals, senior leadership teams and designated safeguards

Brighton College-specific notes on the following:

Harmful behaviour by other children – peer on peer abuse

Children may be harmed by other children or young people. All staff should be aware of how peer on peer abuse may manifest itself:

- bullying (including online cyberbullying);
- physical abuse such as hitting, kicking, biting, hair pulling or otherwise causing physical harm;

- sexual violence and sexual harassment;
- gender-based violence or touching;
- sexual assaults and sexting (youth produced sexual imagery);
- initiation, violence and rituals associated with initiations;
- 'Upskirting'.

UK Government guidance on harmful sexual behaviours is available.

The School seeks to minimise the risk of peer on peer abuse through: clear supervision of pupils, particularly in relation to the boarding community, and regular education on high standards of courtesy and respect expected in the language and behaviour of pupils to one another, whether on- line or in person. Peer on peer abuse can be 'gendered' (for example, KCSIE states that it is more likely that girls will be victims and boys perpetrators) but staff are clear that all peer on peer abuse is unacceptable and will be taken seriously; so-called 'banter' is not an acceptable vehicle for unkindness or abusive behaviour towards others.

Staff will be aware of the harm caused by bullying and will use the School's anti-bullying procedures where necessary. However, there will be occasions when a child's (or children's) behaviour warrants a response under child protection rather than anti-bullying procedures. All such instances must be reported to the DSL and will be dealt with in accordance with the procedures above. Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, harm, the DSL will refer the abuse to external agencies, including, as necessary, the police, and local services in accordance with the procedures in this policy.

A pupil (or pupils) against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School may take advice from the local authorities on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse.

The victim of peer-on-peer abuse will be given strong support, in co-ordination with their family or carer, via the pastoral system and a School counsellor, using external experts where appropriate.

The management of children and young people with harmful behaviour (including sexually harmful behaviour) can be complex and the School will work with other relevant agencies to maintain the safety of the whole School community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator – i.e. all children involved will be treated as being "at risk".

Domestic Abuse

Domestic Abuse is defined as any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial; and
- emotional

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

Sexting (Youth Produced Sexual Imagery)/Devices

If a Child Protection issue is suspected, the device must be handed to the Designated Safeguarding Lead without any content first being viewed. Part 5 of KCSIE makes it clear that staff should not view or forward alleged illegal images of a child, and signposts advice for staff on what to do when viewing an image is unavoidable.

The Designated Safeguarding Lead will liaise closely with the relevant HM and Head of School regarding appropriate pastoral and disciplinary responses. The DSL may be duty-bound to inform the local authorities and the Police.

Sexually active pupils

If a pupil reveals that he or she is sexually active it may be a child protection issue. The member of staff concerned should report this to the Designated Safeguarding Lead. They will then decide, having due regard to the pupil's age and maturity, whether this is indeed a child protection issue. If so, steps should be taken to arrange appropriate support. The College Nursing Sister, HMs, parents and members of the College Leadership Team will be consulted where appropriate. If sexual activity were to take place on school premises or on a school trip (when normal School rules always apply), this would also be considered a disciplinary matter, to be handled by the Deputy Head (see the School's Behaviour Policy).

The DSL will, when considering who needs to be informed, consider matters of the age of the pupils involved and the possibility of pupil-on-pupil abuse.

Sexual Violence and Sexual Harassment

The full government guidance is available through the relevant information regarding KCSIE. Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable.

It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT+ children are at greater risk.

Staff at Brighton College should be aware of the importance of:

- making clear that sexual violence and sexual harassment is never acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”;
- and challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Staff must understand that dismissing or tolerating such behaviours risks normalising them.

Sexual violence

It is important that School and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. Full legal explanation of what constitutes a sexual offence can be found in KCSIE, pages 87-89.

Sexual harassment

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual

harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Sexual harassment can cross a line into sexual violence and in considering this the College will take into account the experience of the victim.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include: non-consensual sharing of sexual images and videos; sexualised online bullying; unwanted sexual comments and messages, including, on social media; and sexual exploitation; coercion and threats.

The response to a report of sexual violence or sexual harassment

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they should follow the referral process. As is always the case, if staff are in any doubt as to what to do they should speak to the designated safeguarding lead (or a deputy).

Child Sexual Exploitation (CSE)

The following definition is taken from the DfE 'CSE: definition and guide for practitioners' February 2017, which provides detailed information about CSE: Child sexual exploitation 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.

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. Multi-agency working and information sharing are vital in tackling all forms of abuse, but it is clear that they are particularly important in identifying and preventing child sexual exploitation.

Female Genital Mutilation (FGM)

There is a specific legal duty for teachers to report to the police cases where an act of FGM appears to have been carried out on a girl under the age of 18. In addition, and applicable to all staff (not just teachers), concerns about FGM should be raised with the DSL for referral to children's social care if appropriate.

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. This includes so-called 'honour' based abuse. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM, such as Somali, Kenyan, Sudanese, Sierra Leonean, Egyptian, Nigerian, Eritrean, Yemeni, Kurdish and Indonesian communities.

Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 11-12 of the Multi-Agency Practice Guidelines referred to previously.

Teaching staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

Self-harming, eating disorders, anxiety or depression

It is recognised that some young people have a problem with self-harming/eating disorders/anxiety/depression and that this may be as a result of unhappiness in some aspect of their life (which may, in the worst case scenario, be linked to a child protection issue). Staff (especially those in positions of pastoral responsibility) should be vigilant and aware of the causes and symptoms of self-harming/eating disorders/anxiety/depression and should refer any cases to medical centre staff as soon as possible, whose staff will keep the Designated Safeguarding Lead informed.

Missing Pupils

See the Missing Pupils Policy. Staff should be alert to the possible safeguarding implications of a pupil running away or deliberately going missing.

Unexplained absences of pupils on the child protection register

The Designated Safeguarding Lead must notify Children's Services if there is an unexplained absence of more than two days of a pupil who is on the child protection register. In such a case, where the child is not at morning registration, contact is made as soon as possible to find out what explanation is given for absence. Depending on the response received, a referral will be made more urgently. In practice, this is flagged up by class teachers, College HMMs or the school administration team (in the Nursery, Pre-Prep and Prep) who will alert the Designated Safeguarding Lead (or a member of the Safeguarding team) immediately.

Child Missing from Education

A child going missing from education, particularly repeatedly, may be an indicator of abuse or neglect. In addition to the procedures to follow if a child goes missing from School, staff should have in mind the potential safeguarding concerns relating to travelling to conflict zones, FGM and forced marriage.

All staff are informed of the separate procedure to be used for searching for, and if necessary, reporting, any pupil missing from school. The procedure includes the requirement to record any incident, the action taken and the reasons given by the pupil for being missing. Schools have a duty to report children missing education.

Mental Health Support

The School has an important role to play in supporting the mental health and wellbeing of our pupils.

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Clear systems and processes are in place for identifying possible mental health problems, including routes for pupils to escalate issues and seek help; a child's teacher or HM should be the first point of contact, along with the College Counsellor.

The College has links with Maudsley Clinic in Abu Dhabi for referral of children with significant mental health and well-being challenges.

Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people. See Rise Above for links to all materials and lesson plans.

What to do if you suspect a child is at risk of harm

If a member of staff is concerned that a pupil may be suffering harm or is at risk of harm, they must act on this immediately. Staff should refer the matter to the DSL or Head of School as soon as possible.

If there is a risk of immediate serious harm to a child a referral should be made to ADEK immediately, or in an emergency, dial 999 and request the appropriate emergency service. Anyone can make such a referral. The DSL should be informed as soon as possible.

There will be occasions when you suspect that a child may be at serious risk, but you have no 'real' evidence. The child's behaviour may have changed, their art or written work could be concerning or you may have noticed other physical but inconclusive signs. In these circumstances, you should try to give the child the opportunity to talk. The signs you have noticed may be due to a variety of factors and it is fine to ask the child if they are alright or if you can help in any way.

Record these early concerns and pass it to the DSL immediately. If the child does begin to reveal that they are being harmed or is at risk of harm, including radicalisation, you should follow the advice in section 5.5 below: 'If a child discloses information to you'.

If a child discloses information to you

The NSPCC have created a very helpful resource entitled Let Children Know You're Listening (Helping adults respond to children disclosing abuse).

It takes a lot of courage for a child to disclose that they are being neglected and / or abused. They may feel ashamed, particularly if the abuse is sexual, their abuser may have threatened what will happen if they tell, they may have lost all trust in adults, or they may believe, or have been told, that the abuse is their own fault.

If a child talks to you about any risks to their safety or wellbeing you will need to let them know that you must pass the information on – you are not allowed to keep secrets or promise confidentiality. The point at which you do this is a matter for professional judgement. If you jump in immediately the child may think that you do not want to listen; if you leave it till the very end of the conversation, the child may feel that you have misled them into revealing more than they would have otherwise.

During your conversation with the child:

- Allow them to speak freely.
- Remain calm and do not overreact – the child may stop talking if they feel they are upsetting you.
- Give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'.
- Do not be afraid of silences – remember how hard this must be for the child.
- Under no circumstances ask investigative or leading questions – such as how many times this has happened, whether it happens to siblings too, or what the child's mother thinks about all this.
- At an appropriate time tell the child that in order to help them you must pass the information on.
- Do not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused.
- Avoid admonishing the child for not disclosing earlier. Saying 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be your way of being supportive but the child may interpret it that they have done something wrong.
- Tell the child what will happen next. The child may agree to go with you to see the DSL. Otherwise let them know that someone will come to see them before the end of the day.
- Write up your conversation as soon as possible and give it directly to the DSL.

- Seek support if you feel distressed.

Note: best practice dictates that you should not write any notes whilst the pupil is speaking. Write up your notes immediately after the meeting, and give the Designated Safeguarding Lead these notes, however rough. If an aide-memoire is required, only very brief phrases or notes should be jotted down - the priority is to listen, not to write down everything that is said, and the writing of any notes may lead a pupil to clam up. Remember that you should only record the facts as the child presents them. The notes should not reflect the personal opinion of the note taker, observations can be made but should be clearly recorded as such. Notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation.

Taking action: Advice for staff

Key points to remember for taking action are:

- in an emergency take the action necessary to help the child, for example, call 999;
- record factual information regarding their concerns on the same day using CPOMS software. If access to CPOMS is not possible, paper records must be dated with a clear and concise account of the observations.
- report your concern to the DSL as soon as possible, unless it involves an allegation against a member of staff or volunteer in which case the procedures in Appendix 3 should be followed;
- if the DSL is not available, ensure the information is shared with the relevant Head of School, or Head Master.
- if there is a risk of immediate serious harm to a child and it is not possible to report the matter in accordance with this procedure, a referral should be made to local children's services or, if appropriate, the police immediately.
- never start your own investigation;
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family;
- seek support for yourself if you are distressed.

Reporting directly to child protection agencies

In line with MOE, ADEK and KCSIE, any staff member can make a referral to ADEK although where possible, there should be a conversation with the DSL to agree a course of action.

If, at any point, there is a risk of immediate serious harm to a child, and you are unable to share the information with the DSL or the most senior person in the School you can find to help you, a referral should be made to the local authority or police immediately.

Remember: anybody can make a referral.

When referrals are not made by the DSL, the DSL should be informed as soon as possible that a referral has been made.

Under these circumstances, you (or, if necessary, the most senior person in the School that you can find to help you) should contact ADEK or the police.

This information is taken to help the specialist safeguarding team make enquiries, and contact you again if necessary. Information you supply is held in the strictest of confidence and not disclosed to any party; including those connected to the child you have concerns about.

Notifying parents

The School will normally seek to discuss any concerns about a child with their parents. This must be handled sensitively and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure.

However, if the School believes that notifying parents could increase the risk to the child or exacerbate the problem, then advice will first be sought from the Head Master.

For the avoidance of doubt, referrals do not require parental consent. Staff must act in the best interests of the child, even if this means making a referral against the parents' wishes.

Action by the DSL - Referral

The DSL will make a referral immediately if it is believed that a child has suffered or is at risk of suffering harm.

In situations where a pupil is not at risk of suffering harm but is instead in need of additional support from one or more agencies (referred to as a 'child in need'), the DSL will still liaise with the local authority in accordance with inter agency procedures and, depending on their advice, will complete an assessment form or engage with any other approach offered by the local authority (e.g. "Team around the Child") to ensure assessment/referral of the pupil and/or his parents for appropriate social care services.

If there is room for doubt as to whether a referral should be made, the DSL will consult with the local authority on a no names basis without identifying the family. However, as soon as sufficient concern exists that a child may be at risk of harm, a referral will be made without delay.

If the initial referral is made by telephone, the DSL will confirm the referral in writing within 24 hours. If no response or acknowledgment is received within three working days, the DSL will contact the local authority again.

Confidentiality and sharing information

When making decisions on what information to share and when, the most important consideration is whether information sharing is likely to safeguard and protect the child. Staff must consider if the information shared is necessary for the purpose for which it is being shared, ensure it is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (see principles – seven golden rules - in the government's non-statutory advice on Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (HM Government, July 2018)

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the child and staff involved but also to ensure that being released into the public domain does not compromise evidence.

Whilst the School understands the specific responsibilities arising from the General Data Protection Regulation and the Data Protection Act 2018 to process personal information fairly and lawfully, staff must be clear that this is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about information sharing cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children. Guidance in KCSIE 2020 and 'Data Protection: toolkit for schools' specifically reminds staff who need to share 'special category personal data' that "the Data Protection Act 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information. This includes allowing practitioners to share information without consent, if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk".

Staff must not promise confidentiality to a pupil and will always act in the best interests of the pupil.

Staff should only discuss concerns with the DSLs, the Heads of School, the Head Master, or the Chair of Governors (depending on the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

The School will co-operate with police and Child Protection Services to ensure that all relevant information is shared for the purposes of child protection investigations under Section 47 of the Children Act 1989 in accordance with the requirements of Working Together to Safeguard Children 2018.

Where allegations have been made against staff, the School will consult with the Head Master and, where appropriate, the police and Children's Services to agree the information that should be disclosed and to whom. The reporting restrictions applicable to such matters will be observed.

All written information will be stored in a locked facility and any electronic information will be kept in a password-protected area. All electronic information will be safely stored on C-Poms.

SECTION SIX: APPENDICES

Appendix 1 Indicators of Abuse and Neglect

Knowing what to look for is vital in the early identification of abuse and neglect. If staff are unsure they should always speak to the DSL.

Staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with each other.

The following (taken from KCSIE, September 2020) are different types of abuse for which to be vigilant:

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or 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 a 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 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.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

In addition, staff should be aware of the signs, indicators and effects of harmful sexual behaviours. Information is available from the following sources:

- DfE: Sexual violence and sexual harassment between children in schools and colleges Advice for governing bodies, proprietors, headteachers, principals, senior leadership teams and designated safeguarding leads (May 2018)
- NSPCC
- Brook Sexual Behaviours Traffic Light Toolkit

Appendix 2 Recognising Indicators of Abuse

As part of training, staff are also provided with the following guidance for recognising the indicators of abuse:

Physical abuse

Physical indicators:

- Unexplained bruises and welts on the face, throat, upper arms, buttocks, thighs or lower back in unusual patterns or shapes which suggests the use of an instrument on an infant in various stages of healing that are seen after absences, weekends, or vacations.
- Unexplained burns, cigarette burns, especially burns found on palms, soles of feet, abdomen, buttocks; immersion burns producing "stocking" or "glove" marks on hands and feet; "doughnut shaped" on buttocks or genital area.
- Rope burns.
- Infected burns indicating delay in treatment; burns in the shape of common household utensils or appliances.

Behavioural Indicators:

- Behavioural extremes (withdrawal, aggression, regression, depression).
- Inappropriate or excessive fear of parent or caretaker.
- Antisocial behaviour such as substance abuse, truancy, running away, fear of going home.
- Unbelievable or inconsistent explanation for injuries.
- Lies unusually still while surveying surroundings (for infants).
- Unusual shyness, wariness of physical contact.

Emotional Abuse

Physical Indicators:

- Eating disorders, including obesity or anorexia.
- Speech disorders (stuttering, stammering).
- Developmental delays in the acquisition of speech or motor skills.
- Weight or height level substantially below norm.
- Flat or bald spots on head (infants).
- Nervous disorders (rashes, hives, facial tics, stomach aches).

Behavioural Indicators:

- Habit disorders (biting, rocking, head-banging).
- Cruel behaviour, seeming to get pleasure from hurting children, adults or animals; seeming to get pleasure from being mistreated.
- Age-inappropriate behaviours (bedwetting, wetting, soiling).
- Behavioural extremes, such as overly compliant-demanding; withdrawn-aggressive; listless- excitable.

Sexual Abuse

Physical Indicators:

- Torn, stained or bloody underclothes.
- Frequent, unexplained sore throats, yeast or urinary infections.
- Somatic complaints, including pain and irritation of the genitals.
- Sexually transmitted diseases.
- Bruises or bleeding from external genitalia, vagina or anal region.
- Pregnancy.

Behavioural Indicators:

- The victim's disclosure of sexual abuse.
- Regressive behaviours (thumb-sucking, bedwetting, fear of the dark).
- Promiscuity or seductive behaviours.
- Disturbed sleep patterns (recurrent nightmares).
- Unusual and age-inappropriate interest in sexual matters.
- Avoidance of undressing or wearing extra layers of clothes.
- Sudden decline in school performance, truancy.
- Difficulty in walking or sitting.

Neglect

Physical Indicators:

- Poor hygiene, including lice, scabies, severe or untreated diaper rash, bedsores, body odour.
- Squinting.
- Unsuitable clothing; missing key articles of clothing (underwear, socks, shoes); overdressed or underdressed for climate conditions.
- Untreated injury or illness.
- Lack of immunisations.
- Indicators of prolonged exposure to elements (excessive sunburn, insect bites, colds).
- Height and weight significantly below age level.

Behavioural Indicators:

- Unusual school attendance.
- Chronic absenteeism.
- Chronic hunger, tiredness, or lethargy.
- Begging for or collecting leftovers.
- Assuming adult responsibilities.
- Reporting no caretaker at home.

Child Sexual Exploitation

Physical indicators:

- Tiredness, mood swings
- Bruising
- Sexually transmitted diseases
- Pregnancy

Behavioural indicators

- Sudden decline in school performance, punctuality, attendance
- In possession of expensive goods
- Going to places you know they cannot afford
- Age-inappropriate clothing
- Inappropriate sexualised behaviour
- Secretive
- Mixing with older people

Female Genital Mutilation

Physical indicators:

- Difficulty walking, sitting, standing
- Spend longer than normal in the bathroom
- Bladder or menstrual problems

Behavioural indicators:

- May talk about a 'special procedure' or 'special occasion to become a woman'
- Abroad for a prolonged period
- Unusual absence
- Reluctant to undergo normal medical examinations

No list of abuse or neglect indicators can include all signs, and staff are advised to use their best judgement.

Appendix 3 Procedure to be followed in the event of an Allegation of Abuse against a member of staff or volunteer (taken from Part Four of KCSIE)

It is expected that all staff and Governors involved in the management of allegations of abuse made against a member of staff or volunteer or former member of staff or volunteer will comply at all times with DfE statutory guidance contained within the document: Keeping Children Safe in Education (2020). The following guidance is drawn directly from part four of KCSIE.

School staff, because of their daily contact with children in a variety of situations including the wider caring role, are particularly vulnerable to accusations of abuse. Their relationships with pupils may lead to allegations being made against them by pupils or adults with parental responsibilities. In any such case, these procedures need to be applied with common sense and judgement; a quick response and resolution is a priority.

All staff should feel able to raise concerns about poor or unsafe practical and potential failures in the School's safeguarding regime and know that such concerns will be taken seriously by the College Leadership Team. The School's Whistleblowing policy covers this in more detail.

A3.1 The School's procedures

The School's procedures for dealing with allegations made against staff or volunteers or former staff or volunteers will be used where the member of staff or volunteer is alleged to have:

- behaved in a way that has harmed a child, or may have harmed a child;
 - possibly committed a criminal offence against or related to a child;
 - behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children;
- or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (for example, if they have been involved in an incident outside school which did not involve children but could be regarded as relevant to their suitability to work with children).

This procedure relates to members of staff (including supply staff and volunteers) who are currently working in the School regardless of whether the School is where the abuse is alleged to have taken place. Allegations against former members of staff or volunteers who are no longer working at the School will be referred to the police, and to ADEK.

If an allegation is made against a member of staff or volunteer, the School's priority will be to achieve a quick resolution of that allegation in a fair and consistent way that provides effective protection for any child involved and at the same time supports the person who is the subject of the allegation. All such allegations must be dealt with as a priority without delay.

All staff are informed as part of their training that any member of staff can make a referral, as specified in KCSIE (2020).

The following definitions are to be used when determining the outcome of allegation investigations:

- a. Substantiated: there is sufficient evidence to prove the allegation;
- b. Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- c. False: there is sufficient evidence to disprove the allegation;
- d. Unsubstantiated: this is not the same as a false allegation. It means that there is insufficient evidence to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

e. Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

The procedures to be followed in all such cases are outlined in Part 4 of KCSIE here:

Of particular significance are the sections in Part 4 of KCSIE on the use of suspension, appropriate information sharing, what to do on conclusion of a case and whether any lessons can be learned, regardless of the outcome of the case (see below).

A3.2 Reporting an allegation against staff or volunteers

All allegations, complaints, concerns or suspicions against staff, including supply staff, or volunteers, should be reported to the Head (or to the DSL who will inform the Head); in the absence of the Head of Junior School or Head of Senior School, they may be reported to the Head Master of the College, or in his absence the Chairman of Governors. In no case should an allegation, complaint, concern or suspicion be reported to the individual who is the subject of the concern, and neither should that individual be informed of the allegation, complaint, concern or suspicion at this stage.

All allegations, complaints, concerns or suspicions about the Head of Junior or Senior Schools should be reported to the Head Master of the College (or in his absence, the Chairman of Governors) without the Head of Junior or Senior School being informed; those about the Head Master or a member of the Governing Body should be reported to the Chairman of Governors without the Head Master or the member of the Governing Body being informed.

The Head Master, DSL or Chairman of Governors should discuss the allegation immediately in order to consider the nature, content and context of the allegation and to agree a course of action. The case manager will also inform the DSL, or, if the DSL is the subject of the allegation, the other DSLs. The Head Master or DSL may consult the Police and Children's Services as appropriate.

In a strategy discussion or the initial evaluation of the case, the case manager should share all relevant information they have about the person who is the subject of the allegation, and about the alleged victim(s).

A3.3 Disclosure of information

The case manager will inform the accused person as soon as possible after consulting the Head Master and will provide as much information as possible at that time.

The parents or carers of the child[ren] involved will be informed of the allegation as soon as possible if they do not already know of it. They will also be kept informed of the progress of the case and the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed, but the parents or carers of the child should be told the outcome in confidence.

Where the Head Master advises that a strategy discussion is needed, or police or Local Authority services need to be involved, the case manager will not speak to the accused person or the parents or carers until those agencies have consulted and have agreed what information can be disclosed.

The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed and, where necessary, parents and carers will be made aware of the prohibition on reporting or publishing allegations about teachers. If parents or carers express a wish to apply to the court to have reporting restrictions removed, they will be told to seek legal advice.

The case manager should take advice from ADEK, police and children's social care services to agree the following:

- who needs to know and, importantly, exactly what information can be shared;
- how to manage speculation, leaks and gossip;
- what, if any information can be reasonably given to the wider community to reduce speculation; and
- how to manage press interest if and when it should arise.

Where the police are involved, wherever possible the case manager will ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the employer disciplinary process. This should be done as their investigation proceeds and will enable the police to share relevant information without delay at the conclusion of their investigation or any court case.

A3.4 Action to be taken against the accused

The School has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. Individuals will be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless external agencies object to this. He/she will also be given access to counselling and medical advice.

The case manager will appoint a named representative to keep the member of staff informed of the progress of the case and to consider what other support might be appropriate. If the member of staff is suspended he/she will also be kept up to date with current work-related issues.

Where an investigation by the police or local authority is unnecessary, the Head Master will discuss the steps to be taken with the DSL and Governors. The appropriate action will depend on the nature and circumstances of the allegation and will range from taking no further action to dismissal or a decision not to use the person's services in the future.

A3.5 Suspension

Suspension will not be an automatic response to an allegation and will only be considered in a case where:

- a. there is cause to suspect a child or other children at the School is or are at risk of harm or
- b. the allegation is so serious that it might be grounds for dismissal.

All options to suspension will be considered before taking that step. Consideration will be given to whether the result that would be achieved by suspension could be obtained by alternative arrangements, for example, redeployment either within or outside of the School or providing an assistant when the individual has contact with children. The School will give due weight to the views of ADEK and MOE when making a decision about suspension.

A member of staff will only be suspended if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification will be recorded and the member of staff notified of those reasons in writing within one working day. Appropriate support will be provided for the suspended individual and contact details provided. Social contact with colleagues and friends should not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

A3.6 Criminal proceedings

The School will consult with the police and ADEK following the conclusion of a criminal investigation or prosecution as to whether any further action, including disciplinary action, is appropriate and if so, how to proceed. The options will depend on the circumstances of the case, including the result of the police investigation or trial and the standards of proof applicable.

A3.7 Return to work

If it is decided that the person who has been suspended should return to work, the School will consider how best to facilitate this, for example, arranging a phased return and / or the provision of a mentor to provide assistance and support in the short term. The School will also consider how to manage the contact with the child[ren] who made the allegation.

A3.8 Unsubstantiated, false or malicious allegations

Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Head will consider whether to take disciplinary action in accordance with the School's behaviour and discipline policy.

Brighton College may apply appropriate sanctions to pupils who are found to have made malicious allegations. This could include temporary or permanent exclusions or referral to the police if a criminal offence may have been committed.

Where a parent has made a deliberately invented or malicious allegation the Head will consider whether to require that parent to withdraw their child or children from the School on the basis that they have treated the School or a member of staff unreasonably.

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

A3.9 Record keeping and references

Details of all allegations found to be malicious will be removed from personnel records.

A clear and comprehensive summary of any allegations made against a member of staff, and all details leading to and including a resolution, and a note of any actions taken and decisions reached will be kept on the confidential personnel file and will be retained until the accused has reached normal retirement age or for a period of 10 years if that is longer. However, where an issue or concern relating to a member of staff and the safeguarding of children has been identified, records of any concerns, suspicions or investigations will be kept for 75 years. Such records will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time.

The School will provide information regarding a substantiated allegation for the purposes of future references and DBS disclosures in accordance with the School's safer recruitment procedures. In cases where allegations are found to be malicious or unsubstantiated, reference will not be made in employer references.

A3.10 Review and Learning Lessons

At the conclusion of a case in which an allegation is substantiated, the Head Master and DSL should review the circumstances of the case with the case manager 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.

This should include issues arising from the decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified.

Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The Head Master and DSL should consider how future investigations of a similar nature could be carried out without suspending the individual.

Appendix 7: Mobile phone, tablet and camera acceptable use policy

Aims

We aim to provide an environment in which:

- children, parents and staff are safe from images being recorded and used inappropriately;
- staff are not distracted from their work with children and
- mobile phones and cameras are not used inappropriately around children

Implementation

We aim to protect children by implementing a clear policy on the acceptable use of mobile phones, tablets and cameras that is understood and adhered to by all parties concerned without exception. This policy applies to all staff, parents and volunteers at Brighton College Al Ain.

Parents

The College's Privacy Notice sets out the legal grounds for processing personal data, including images and photographs. The College may ask for parental consent before taking or using some photographs and videos if the photograph or video is more intrusive and we cannot rely on legitimate interests. If we ask for parental consent to use your child's personal information, this consent can be withdrawn at any time. Staff should remind

parents regularly of the school policy with regard to mobile phone use with the following statement in the school handbook and when announcing events:

“You are welcome to photograph your child at school events providing the images are for personal use only (e.g. family album). Please be aware that these images (which may include other children) must not be shared on social networking sites or other web-based forums since we regard this as ‘making the image public’. Sharing images, or uploading them into a ‘public space’, is likely to be in breach of data protection law.”

Mobile Phones

- The School allows staff, and parents, to bring in personal mobile telephones and devices for their own use. Staff, and parents, are responsible for their own mobile devices and the school is not responsible for theft, loss or damage.
- Personal mobile phones/cameras (including for instant messaging, internet use or social networking sites) must not be used or on display (switched off or silent mode) during lessons or in the presence of children.
- The setting does not allow members of staff to contact parents using their personal devices – except for dire emergencies e.g. emergency contact with parents required, but malfunction of all the setting phones due to power cuts / lack of mobile signal for the setting mobile. If required to use a personal phone, staff should input 141 to ensure their own number is hidden.
- Users bringing personal devices into the setting must ensure there is no inappropriate or illegal content on the device.
- Staff may only take phone calls during staff breaks or in their own time in an area away from children, but not in the staff room.
- If staff have a personal emergency they are free to use the school’s phone or make a personal call from their mobile in an area away from children, but not in the staff room.
- Staff (will need to) ensure that the School have up to date contact information and that staff make their families, children’s schools etc. aware of emergency work telephone numbers. (This is the responsibility of the individual staff member.)
- During group outings staff may use their mobiles for emergency purposes only.
- It is the responsibility of all members of staff to be vigilant and report any concerns to the Head.
- Concerns will be taken seriously, logged and investigated appropriately. (Please refer to the Safeguarding Policy with regard to allegations against a member of staff.)
- The School (via the Head, ICT Systems Manager, or other designated employee) reserves the right to check the image contents of a staff member’s mobile phone should there be any cause for concern over the appropriate use of it.

Cameras & Tablets

- Photographs may be taken by staff for the purpose of recording a child or group of children participating in activities or celebrating their achievements. However, it is essential that photographs are taken and stored appropriately to safeguard the children in our care.
- Images taken by staff on these cameras must be deemed suitable without putting the child/children in any compromising positions that could cause embarrassment or distress.
- All staff are responsible for the location of cameras or tablets, which should be stored securely when not in use e.g. in a locked cupboard in the classroom.

- Images taken and stored on the camera must be downloaded, by a member of Brighton College staff, as soon as possible, ideally once a week.
- Images should be downloaded on site.
- Under no circumstances must cameras of any kind be taken into the washroom.
- All staff are responsible for checking that only age-appropriate material is used in school.
- Staff must do all that they can to ensure that technologies are not used to tease, bully or threaten.
- When accessing the school WiFi, staff must adhere to the Staff and Volunteer Acceptable Use Policy.

Failure to adhere to the contents of this policy will lead to disciplinary procedures being followed.

Electronic Communication

DO NOT:

- Give your personal contact details, including e-mail, home or mobile telephone numbers, unless the need to do so is agreed with senior management and parents.
- Share or store personal mobile numbers of pupils on personal mobile phones where practicable
- View photographs/videos on an electronic device you have confiscated from a pupil. It is important to note that if you suspect content may be a child protection matter, you must pass the device directly to the Designated Safeguarding Lead or in their absence the Head of Junior, Head of Senior or Head Master without viewing or forwarding any content.

DO:

- Keep phone contact and e-communication formal and copy in another member of staff if communication is not coursework-related.
- Use School email addresses, the school phone system and/or school mobile telephones (rather than personal ones) when making contact with pupils.
- When using a social networking site, ensure that details are not shared with children and young people and that privacy settings are set at maximum. (Do not, for example, be friends with a pupil on Facebook.) Think carefully before 'friending' former pupils, especially those with friends who are current pupils: the Code of Conduct sets out that staff should not befriend former pupils until at least a year after they leave, and even then they should consider carefully whether this would be wise

Appendix 5: COVID-19 arrangements for Safeguarding and Child Protection

Identified risk/policy area needing review/update as a result of Covid-19

Mitigating actions/change in policy required

Should a pupil have to self-isolate and continue with their education remotely

It is important that all staff who interact with children, including online, continue to look out for signs a child may be at risk. It is likely that children will be using the internet and engaging with social media far more during this time. Our staff are aware of the signs of cyberbullying and other online risks and our filtering and monitoring software remains in use during this time to safeguard and support children.

Any concerns should be dealt with in line with procedures laid out in this Policy and, where appropriate, referrals should still be made to ADEK and as required, the police.

It is crucial that pupils' mental health and wellbeing is monitored by staff whilst a pupil is continuing with remote education. This will include regular support and 1:1 conversations with their tutors and HMs and access to the College counsellor, should they require it.

Online teaching should follow the same principles as are set out in the Brighton College Staff Code of Conduct and the separate guidelines sent to all staff and parents (Distance Learning – Safeguarding).

1:1 lessons and conversations

The vast majority of lessons will be conducted within a 'live' class environment, but it is recognised there will be occasions for those who are unable to attend the school site when it is necessary for 1:1 lessons or conversations to take place. In these circumstances, staff should adhere to the principles laid out in the Covid-19 Guidelines for Staff document.

Additionally, staff should always record 1:1 lessons and academic advice sessions via the function for this within Google Meets. These videos will be stored on a teacher's Brighton College Google Mail accounts and account for safeguarding purposes only. Recordings should not be downloaded, copied or removed from this platform.

Where recording a conversation would not be appropriate, or may lead to a child feeling uncomfortable about continuing a conversation, such as a pastoral conversation with a tutor, an account of these conversations (including the date and time at which the conversation took place) must be added to the appropriate platform as soon as is reasonably possible; brief notes should be uploaded to iSAMS, or, if deemed to be a safeguarding concern, directly to the DSL

Focus on mental health in relation to COVID-19

The coronavirus outbreak may have caused significant mental health or wellbeing difficulties for some children. It is important to recognise that while 'getting back to normal' is important and will be reassuring for many, the College will ensure it fully supports:

- Individual children who have found the long period at home hard to manage.
- Those who have developed anxieties related to the virus.
- Those about whom there are safeguarding concerns.
- Those who may make safeguarding disclosures once they are back in schools.

Some children may also have experienced bereavements in their immediate family or wider circle of friends or family or had increased/new caring responsibilities. Particular attention should be paid to children of Key Workers, whose parents may have been under particular stress during the response to the pandemic.

The College will be sensitive to these needs and can offer support to anyone who has suffered a bereavement.

All children will have missed the routine of school, seeing their friends, and being supported by their teachers and other adults in the school.

During the term the College will provide:

- Opportunities for children to talk about their experiences of the past few weeks.
- Opportunities for one-to-one conversations with trusted adults where this may be supportive.
- Some refocussed lessons on relevant topics, for example, mental wellbeing or staying safe.

- Pastoral activity, such as positive opportunities to renew and develop friendships and peer groups.
- Other enriching developmental activities.

Further guidance on how best to support mental health and wellbeing throughout this period can be found by accessing the following UK DfE publications:

<https://www.gov.uk/government/publications/covid-19-guidance-on-supporting-children-and-young-peoples-mental-health-and-wellbeing/guidance-for-parents-and-carers-on-supporting-children-and-young-peoples-mental-health-and-wellbeing-during-the-coronavirus-covid-19-outbreak>

If a pupil or member of staff has to self isolate

If a pupil or member of staff receives a positive PCR test result from Seha, they must inform Amy Stewart and/or Melanie Rackham immediately. Contact tracing will be carried out within the College within 1 hour of the information being received. All pupils and staff who have had direct contact with the positive case for 15 minutes or more will be sent for a PCR test immediately and asked to self isolate at home until results are received. Seha will contact all staff and pupils directly after initial contact tracing at College.

The Head Master will consult with ADEK and Seha in regards to which bubbles within the College may remain open as usual. Some year groups may be asked to stay at home and move to Distance Learning. The Head Master will communicate with all staff as to the which pupils and teachers may remain in College.

If a member of staff is instructed to quarantine by Seha, the member of staff should inform the DSL and/or the Head of Junior/Senior School immediately. Staff will be fitted with a tracking device and must follow all instructions given by Seha.

If a member of staff has tested positive for Covid-19 and is feeling unwell, they will not be expected to conduct Distance Learning lessons. If the member of staff who has tested positive for Covid-19 remains well and/or asymptomatic, they may continue to conduct Distance Learning lessons from home.