



## READING BLUE COAT

### Child Protection and Safeguarding Policy

#### The School's Commitment

Reading Blue Coat School (RBC) is fully committed to the safety and wellbeing of children and young people. It aims to provide a warm, nurturing, and safe environment, where pupils feel secure and supported. All members of the School community are asked to take responsibility for protecting and safeguarding children, recognising the right of all children to grow up without fear of abuse and harm. The leadership of the School will follow its duty to protect children unflinchingly. All staff are asked to read and understand this policy, and to act on it whenever necessary. Through working together and taking a positive, proactive approach, the School may provide great reassurance to pupils and their families.

The School's commitment to protect and safeguard also reflects an outworking from the fundamental values espoused by Reading Blue Coat, namely:

- **Aspiration** – the realistic and hopeful expectation that *all* children can and should be protected from harm.
- **Courage** – the willingness to ask difficult questions and make difficult decisions where it is in the child's interests for us to do so.
- **Compassion** – the acknowledgement and support for those who suffer, particularly for those affected by abuse, poor mental health, and other risks to children.
- **Service** – the desire to put the needs of others before oneself, giving time and emotional energy unstintingly for the welfare of children.
- **Integrity** – the determination to act always in accordance with principle and make decisions in light of what is fair, honest, and true.

This policy sets out the School's commitment in practical terms, showing clearly and simply how it is implemented day-to-day.

The School's commitment is fundamentally defined by statutory guidance, *Keeping Children Safe in Education* (2021), and all aspects of that guidance are in force within the School.

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## Contacts

The key contacts for Reading Blue Coat School are as follows:

### Safeguarding Team

Name	Role	Other roles	Contact
Guy Williams	Designated Safeguarding Lead (DSL)	Deputy Head, Pastoral	<a href="mailto:gjw@rbcs.org.uk">gjw@rbcs.org.uk</a> Ext. 860
Claire Dance	Deputy Designated Safeguarding Lead (DDSL)	Director of Lower School	<a href="mailto:cd@rbcs.org.uk">cd@rbcs.org.uk</a> Ext. 887
Scott Yates	DDSL	Director of Middle School	<a href="mailto:sy@rbcs.org.uk">sy@rbcs.org.uk</a> Ext. 839
Will Mitchell	DDSL	Head of Year 12	<a href="mailto:wem@rbcs.org.uk">wem@rbcs.org.uk</a> Ext. 882
Lisa Bennett	DDSL	Teacher of Religious Studies	<a href="mailto:ljb@rbcs.org.uk">ljb@rbcs.org.uk</a> Ext. 844

Members of the Safeguarding Team can be reached through calling the School switchboard (0118 944 1005) and asking for a connection. Phone extension numbers are given in the table above. The Safeguarding Team can also be contacted via the Pastoral Secretary in the Messer Building (Maria Illingworth: [mci@rbcs.org.uk](mailto:mci@rbcs.org.uk)).

### Senior Contacts

Name	Role	Contact
Pete Thomas	Headmaster	<a href="mailto:hm@rbcs.org.uk">hm@rbcs.org.uk</a>
Ed Trelinski	Second Master	<a href="mailto:etr@rbcs.org.uk">etr@rbcs.org.uk</a>
Peter Bertram	Chair of Governors	<a href="mailto:chair@rbcs.org.uk">chair@rbcs.org.uk</a>
Charlotte Green	Safeguarding Governor	<a href="mailto:safeguarding@rbcs.org.uk">safeguarding@rbcs.org.uk</a>

Contact with Governors may also be facilitated through the Headmaster's Secretary.

### External Contacts

Name	Contact
Berkshire West Safeguarding Partnership: Wokingham	<a href="mailto:triage@wokingham.gov.uk">triage@wokingham.gov.uk</a> tel. 0118 908 8002 – (out of hours: 01344 786 543)
Thames Valley Police	<a href="https://www.thamesvalley.police.uk/">https://www.thamesvalley.police.uk/</a> tel. 101
NSPCC 24-hour helpline	Tel. 0808 800 5000
Childline	<a href="https://www.childline.org.uk/">https://www.childline.org.uk/</a> tel. 0800 1111
Wokingham LADO	<a href="mailto:lado@wokingham.gov.uk">lado@wokingham.gov.uk</a> tel. 0118 974 61 41

### Introduction: Definitions, Scope, and the School's Approach

The definitions of child protection (CP) and safeguarding may be taken as follows:

The NSPCC defines child protection as “*protecting individual children identified as suffering or likely to suffer significant harm.*” (NSPCC Learning, 2021). Although it is more specific than safeguarding, RBC places particular emphasis upon the protection of children as a priority, as its most basic duty is to intervene whenever children and young people suffer or are at risk of harm. Following an independent audit in June 2021, it was advised that the School change its nomenclature to give the hard ‘edge’ of placing CP as the first item in the policy title (rather than safeguarding). Henceforth, we refer to ‘CP and safeguarding’ in policy.

“Safeguarding and promoting the welfare of children is defined 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.” (KCSIE, 2021).

Although the definition of a child is anyone under the age of 18, RBC applies the same policy and standard of care to all pupils (including those already aged 18).

RBC staff are expected to understand what CP and safeguarding look like in practice, recognising topical issues and possible signs of abuse (see Section 5). Regular training will keep track of the fast-changing nature of issues. Where pupil welfare matters are borderline as concerns, staff will be proactive in consulting the RBC Safeguarding Team.

The School’s aim is to implement this policy, to ensure that it consistently pursues the best interests and safety of children. The policy applies to all pupils at RBC, whether in term or in the holidays, onsite or away on trips or at home, and to all other children who are taking part in activities on School premises. The policy should be followed by all members of staff, governors, and volunteers. The School recognises its responsibilities and is committed to its duties as set out by statutory guidance, and this policy will be kept updated accordingly.

External childcare providers and activity organisers may make use of School premises according to their own safeguarding policies, and these will be vetted for suitability by (one or more of): the Bursar, Director of HR, and the Designated Safeguarding Lead (DSL).

The RBC approach is to promote a proactive culture of vigilance and early intervention, to ensure that emerging issues are recognised and dealt with swiftly. This is a collective effort; the School promotes the message: “**safeguarding is everybody’s responsibility**”. To be effective, each professional and organisation should play their part within a child-centred approach. This requires understanding the needs and views of children; careful listening is at the heart of what we do. Every complaint or concern will be taken seriously. Where it is

necessary to make referrals or work with external agencies, this will be instigated rapidly, and the general approach at RBC is to take the best advice from local experts.

We follow the **procedures of the Berkshire West Safeguarding Partnership** (as set out in the pan Berkshire procedures manual), of which our Local Authority (Wokingham) is a member. Additionally, we work closely with any other safeguarding partnerships where our pupils are resident, such as Oxfordshire, Windsor and Maidenhead, Bracknell Forest, *etc.* In all work with external agencies, RBC staff will ensure that all parties communicate effectively, following appropriate procedures.

## **Signs of Abuse, CP and Safeguarding Issues**

Staff are expected to be able to identify types of abuse and signs of abuse, as well as having a good general understanding of current safeguarding issues.

“Child abuse happens when a person – adult or child – harms a child. It can be physical, sexual, or emotional, but can also involve a lack of love, care, and attention. Children who suffer abuse may struggle to find the words to speak out, so it’s vital that anyone working with children or young people is vigilant for the signs of abuse.” (NSPCC, 2018)

If staff are uncertain whether a matter constitutes abuse, they should consult the Safeguarding Team. There are four main types of abuse:

- Physical – causing physical injury or harm. This may involve hitting, shaking, burning, poisoning, *etc.* Injuries may be visible, although pupils may conceal them under clothing, makeup. Harm may also be caused by an adult inducing illness in a child.
- Emotional – attacking a child’s sense of security, self-worth, and relationships. This may include ridicule, conveying a sense of worthlessness, setting unreasonable expectations, highly critical remarks, or depriving children of freedom and expression. Emotional abuse can engender a sense of fear and anxiety.
- Neglect – failing to meet basic needs. This could include depriving a child of nutrition, suitable clothing, sleep, adult supervision, emotional affirmation. Failing to provide suitable medical care may also constitute neglect.
- Sexual – forcing or enticing a child to take part in sexual activities. This could include physical sexual assault, such as penetrative acts, or less violent acts such as masturbation or touching. This may also include non-physical acts, such as asking a child to produce or view sexual images. Children may or may not be aware of or understand what is happening as a part of sexual abuse. Children may also feel that they have consented to the activity. Sexual abuse often takes place online or is preceded by online grooming. It is not exclusively perpetrated by adult males; women and young people may also perpetrate sexual abuse.

The different forms of abuse may overlap or be combined. They can take place either partially or wholly online, or in person. Abusive behaviours and relationships can change over time.

Abuse may manifest itself in different ways and appear differently in different children. It is important to keep an open mind about possible causes for perceived symptoms of abuse. Abuse may impact on both physical and mental health, and it may exacerbate problems that were already present.

Possible signs of abuse occurring may include:

- Pupil telling staff that they have been abused
- Comments or questions from the pupil which indicate this possibility
- Injuries or other signs of harm
- Sudden changes in behaviour
- Sudden changes in academic work or change of subjects
- Apparent avoidance of certain members of staff or pupils
- Neglected appearance
- Reluctance to return home or spend time with family members
- Emotional withdrawal
- Shying away from touch or movements
- Weight loss or gain

Such lists are not exhaustive, and abuse may still be occurring without these indicators.

It is also of critical importance that staff recognise the additional risks relating to pupils with special educational needs or disabilities (SEND). These risks include: staff misinterpreting or assuming that signs of abuse (such as marks or injury) may be explained by a disability, children being socially isolated, SEND pupils being disproportionately affected by bullying without necessarily communicating this fact, and communication barriers. RBC ensures that the SEND Coordinator attends Section meetings with the DSL and relevant DDSL, so that there is a coordinated approach to mitigating risks to SEND pupils.

It is also important for staff to be aware of specific issues, which may further threaten the well-being of children. Some of these may occur within the family, but staff should also understand that risks may be posed by extra-familial contexts (e.g., in the community). All these matters are discussed, with further resources in linked documents, in Part 1 and Annex B of *KCSIE, 2021*. If RBC staff have concerns that a child is exposed to any of the matters here, they should contact the DSL immediately.

As a summary, key **specific safeguarding issues** include the following:

(Anti-)Radicalisation and Prevent: At RBC, we follow the statutory guidance (*Prevent, 2015*) to ensure staff can identify pupils at risk of radicalisation, support them, and build up resilience to such risks through promoting the Fundamental British Values of: democracy, the rule of law, mutual respect, and tolerance. We recognise the real threat of terrorism within the local community, but also the threat that such events may divide us and cause hostility between groups. RBC promotes a culture of vigilance; the School will take advice and / or make referrals to the Channel programme where necessary.

Serious Violence, Youth and Gang Violence: The School realises that some pupils may be drawn into gangs where they could encounter violence or threats with potential serious consequences as part of the culture. Understanding of local issues is essential in this regard.

County Lines and Child Criminal Exploitation: This threat to children is geographically widespread and exploitation is a feature of county lines activity: drug networks that groom young people to carry drugs and money from urban areas to suburban and rural areas. A key sign of involvement would be episodes of school absence. Concerns should be reported to the DSL, who will consider accessing the National Referral Mechanism. Further information is found in the Children's Society report *Counting Lives (2019)*. Staff must be aware of the issue, acknowledging that Berkshire is a regular target for county lines activities (e.g., see *Reading Chronicle* 27<sup>th</sup> May 2021). There have been recent drug arrests in the

local area. Children may also be at risk of other forms of criminal exploitation (CCE), outside of county lines gangs.

Children Missing Education: The School will inform the Local Authority of any pupil who fails to attend regularly without adequate explanation, or who has been absent without permission for a period of 10 school days or more. The School recognises absence as a potential indicator of abuse or neglect and will follow up all concerns. Children who join and leave at non-standard transition times will be checked-off with the school they are leaving or joining to ensure continuity of education. These transitions will be monitored by the Director of Admissions and the DSL. During school transitions, the DSL will also ensure any safeguarding concerns regarding pupils are received from or passed to the other school. As a further measure to ensure pupil contact and attendance, the School will hold two contact numbers for each individual pupil and make enquiries where these numbers are not held.

So-Called Honour Based Abuse (HBA): This encompasses crimes or incidents motivated by the desire to protect the honour of a family or a community, including practices such as FGM, forced marriage, and breast ironing. Specifically, on Female Genital Mutilation (FGM): staff must be alert to the possibility of a girl being at risk of or having suffered from FGM. There is a mandatory reporting duty on teachers to personally report any cases they are aware of to the police. Specifically, on Forced Marriage: it occurs where a marriage is entered into without the full and free consent of both parties, and may involve violence, intimidation, or coercion.

Domestic Abuse: There is a statutory definition for domestic abuse under the *Domestic Abuse Act* of 2021, which encompasses the different relationships and types of abusive behaviours that may be involved. The School recognises the threat posed to the well-being of children by exposure to domestic abuse; where necessary, it will participate in Operation Encompass (or other external support) to ensure that issues are addressed swiftly and effectively.

Child Sexual Exploitation: (CSE) involves exploitative situations and relationships where young people receive something (e.g., food, accommodation, drugs, alcohol, gifts, money or simply affection) for engaging in sexual activities. Sexual exploitation can take many forms, ranging from a seemingly 'consensual' relationship to serious organised crime. The perpetrator holds power over the victim, which increases as the exploitative relationship develops. CSE involves varying degrees of coercion, including unwanted pressure to have sex, sexual bullying, cyberbullying, and grooming. However, it is also important to recognise that some victims do not exhibit any external signs of this abuse.

Peer-on-Peer Abuse: Otherwise known as child-on-child abuse, this can take many forms. Acts of abuse among children may be consistent with a pattern of bullying, such as violence or intimidation, which is further covered in the School's Anti-Bullying policy. Abuse may also take place as part of hazing or initiation ceremonies (e.g., into sports teams). Pupils are also at risk specifically of sexual abuse from their peer group. One aspect of this is sexual violence, which relates to matters governed by the *Sexual Offences Act, 2003*, such as rape or sexual assault. Children can and sometimes do abuse their peers in this way. Another aspect is sexual harassment, unwanted conduct of a sexual nature. It could include comments, taunting, physical behaviour, or be online. There is also the specific (since 2019 criminal) offence of upskirting, which is taking pictures under clothing without knowledge or permission. All RBC staff and volunteers who work directly with children are expected to pay particular attention to the detailed guidance regarding sexual violence and harassment between children in *KCSIE 2021* and in the specific DfE guidance of 2021. The School's response will always be governed by such guidance, so that pupils feel able to come forward and be taken seriously, receiving the best support possible. The School's approach to peer-on-peer abuse is further explained in the section below.

Youth Involved Sexual Imagery: Although it is common for young people to share images of themselves or others as part of their social lives online, there are risks associated with the nature of the content, particularly if it is of a sexual nature. It is illegal to create or share sexual images or videos of under 18s. If staff become aware of such imagery, they should notify the DSL immediately, taking care not to view or share the content. RBC staff are advised to follow the 2020 overview guidance provided by UKCIS. The Safeguarding Team will then follow the full guidance (*Guidance: Sharing Nudes and Semi-Nudes*) in managing their response to any such incidents.

Other Issues: In addition to the issues summarised here, *KCSIE, 2021*, Annex B further identifies the following safeguarding concerns: children in the court system, children with family members in prison, homelessness. These specific issues may affect RBC pupils from time to time, and so it is imperative that RBC staff understand these matters and how they can impact children.

### **Peer-on-Peer Abuse: the School's Approach**

The School recognises the risks and harms presented by peer-on-peer abuse; children are capable of abusing their peers in person and online, and *all* staff are expected to understand the School's approach. This incorporates the following measures:

Training and recognising abuse – All staff are expected to understand the risks of peer-on-peer abuse, including possible indicators and signs of abuse. Specific training is provided through the TES/Educare suite and will be refreshed every three years. All staff should understand the various forms which peer-on-peer abuse may take: bullying, physical harm, sexual violence and harassment, abuse within a personal relationship, sharing images, *etc.* Although girls are more likely to be victims and boys more likely to be perpetrators, it is important to recognise that all peer-on-peer abuse is unacceptable and will be taken seriously. All staff are expected to have sufficient understanding and empathy to listen to any pupils raising concerns, reassuring, and ensuring that appropriate action is taken.

Minimising the risk – Risk of abuse may be anticipated and minimised through the School taking a pro-active approach. Measures include (non-exhaustively): educating pupils through PSHE and other pastoral programming; raising awareness in the pupil body through assemblies, tutorials, events, pupil societies; sending clear signals through behaviour policy and implementation that abuse is never tolerated; ensuring appropriate supervision and management of pupils on site; open communication with parents about the risks and their ability to contact the School.

Management of allegations and those affected – on hearing an allegation, staff are asked to make an immediate referral to the DSL. The DSL will review the information provided and seek any necessary clarification, then logging the allegation securely. Depending upon the allegation, the DSL will investigate by interviewing parties concerned and taking further notes – these will also be logged. In serious and sensitive cases, particularly those concerning potential criminal activity, the DSL may take advice from external agencies before proceeding with an investigation. All allegations will be taken seriously and reviewed in a careful, even-handed way. Resolutions will be communicated clearly, along with their rationale, to the parties affected – pupils in person, parents in writing.

Throughout the investigation and in its resolution, both the 'victim' and the 'perpetrator' will be supported by the School through practical measures, which may include (non-exhaustively): separating pupils and managing their days; briefing staff; regular meetings; counselling; liaising with Children's Services, *etc.* Even after an allegation has a formal resolution, it should be understood that it may affect those involved for months or years to come, and staff should remain vigilant to the pupils' welfare.

Zero tolerance for abuse – the School’s approach to abuse is ‘zero tolerance’ – every case will be followed up and allegations will never be minimised or passed off as being a normal part of teen development (e.g., ‘banter’ or ‘boys will be boys’). All cases of reported abuse must be passed on to the DSL to ensure that this consistent approach is implemented.

## Online Risk

Young people often spend much of their lives online, on various platforms and devices, and RBC staff should be aware of the opportunities and risks this presents. Many safeguarding issues relate to interactions or relationships formed or continued online. Therefore, the RBC Child Protection and Safeguarding Policy should also be read in conjunction with the Internet Safety Policy, and it is important for all staff and pupils to receive regular updates regarding e-safety. For further advice, all members of the community can access ‘Thinkuknow’ online. The School has also bought into the ‘Safer Schools’ app via our insurers (Zurich), which is available to staff, pupils, and parents as a constantly updated resource.

There are many ways in which online activity feeds into safeguarding issues, with examples including:

- Sexual harassment through messages / images
- ‘Catfishing’ for sexual images
- Online blackmail
- Grooming a potential victim of abuse through games, chat, social media
- Conducting exploitation or gang activity on smartphones
- Exposure to age-inappropriate content
- Access to online gambling
- Group bullying or emotional abuse on social media
- Videos / sites promoting harmful ideas (such as terrorism, pro-suicide)
- Giving away personal data, location, etc.

Staff are expected to speak honestly and openly with pupils about online risks, not creating false or hysterical warnings, but giving sound advice based on evidence. E-safety will also feature in the School’s PSHE curriculum.

RBC staff are also required to have regard for appropriate use and conduct of technology for messaging and communicating with pupils and their families online. For example, video conferencing may be used for Parents’ Evenings or for absent pupils to access live-streamed lessons. Careful management of communication will protect both the pupil and the staff member from potential abuse or misunderstanding. The School follows DfE advice on remote learning. General principles for staff include: using online communications for clear and educational purposes, ensuring the appropriateness of context and content of what is shared online, firm, and competent management of the platform (e.g., Teams), and discussing intended uses with the DSL. If it is possible to interact with a pupil in person, in School, then this should always be the favoured means of communication.

## Personnel, Roles and Responsibilities

All staff, volunteers and governors have a duty to protect and safeguard children. All members of the community, including pupils and parents, are encouraged to play their part in supporting a culture of safety and awareness. The RBC approach is to empower people with the desire, ability, and skills to protect young people. The strongest institutions for promoting children’s well-being always build from the idea of a team effort.

### Whole Staff Responsibilities

To further specify their duties, all staff, volunteers, and governors are expected to:

- Maintain broad familiarity with safeguarding issues and practices
- Annually, read and sign to accept the School's policy and *KCSIE* –
  - Part One
  - Annex B
- Participate in any training specified by the DSL
- Abide by all other policies relevant to the welfare and protection of children
- Be prepared to listen to children and pass on any concerns promptly, accurately

### Specific Staff Responsibilities

The Safeguarding Team comprises the DSL and Deputies (see 3. Contacts). The DSL is also the Deputy Head Pastoral and has overall responsibility for safeguarding and discharging the School's duties in this respect. Other senior staff and governors also have roles to play, and these are outlined as follows.

### The Designated Safeguarding Lead (DSL)

*KCSIE* specifies that schools must appoint a DSL with sufficient time, expertise, resources, and seniority to lead in this area. The Headmaster and governors will ensure that they make provision clearly for this in the job description of the DSL. Deputies are appointed to assist the DSL in carrying out duties. The DSL at RBC is Dr Guy Williams (Deputy Head, Pastoral).

The responsibilities and duties of the DSL are as follows:

- Act as first point of contact for reporting of safeguarding concerns
- Write and update policy and guidance, ensuring its successful implementation
- Monitor Government and Local Authority updates to legislation and guidance
- Act as a dedicated resource (knowledge base) for staff on safeguarding
- Lead the School's approach to online safety and other related areas to safeguarding
- Manage the Deputy DSLs and safeguarding workflows
- Submit, manage, and support referrals of suspected abuse to local authorities
- Refer cases of risk of radicalisation to the Channel programme
- Report suspected criminal activity to the police
- Act as point of contact for external agencies dealing with safeguarding matters
- Liaise with the Headmaster and keep him / her updated on significant cases
- Work closely with staff whose jobs link to safeguarding matters (e.g., medical, SENCO)
- Oversee statutory and other safeguarding training for staff
- Ensure that all staff, volunteers, governors read and sign to acknowledge the School's CP and Safeguarding Policy annually, alongside the relevant parts of *KCSIE*
- Ensure that appropriate, secure, accurate records of safeguarding matters are kept
- Prepare annual safeguarding reports to governors; liaise with Safeguarding Governor
- Ensure the School's policy and procedures in this area are always inspection-ready
- Put in place and monitor visiting speaker protocols, policy, vetting of speakers
- Ensure that safeguarding work in the School complies with Data Protection regulations
- Share information appropriately, promptly, with external agencies / professionals
- Ensure prompt, secure transmission of safeguarding files to / from other schools for pupils joining or leaving RBC
- Promote a culture of listening to children and being responsive to their needs

### The Deputy Designated Safeguarding Leads (DDSLs)

The role of the DDSL is to deputise for the DSL where appropriate and to work on a team to manage cases as required. Although a DDSL may deputise for the DSL, *responsibility* for CP and safeguarding cannot be delegated. In addition to supporting and deputising for the duties above, a DDSL also plays an important role in a continual, pro-active discussion of pupils who are a welfare concern, in consultation with the DSL, Heads of Year, and other relevant staff.

At RBC, the DDSLs will be drawn from senior and experienced staff, including the Directors of Section and Heads of Year. They have important roles to play, having a detailed knowledge of the individual pupils. The dynamic between the DSL and DDSL is a key feature and strength of the RBC system.

### The Headmaster

The Headmaster will work alongside the Governing Body and SLT to ensure that RBC discharges all its duties and responsibilities, as set out in *KCSIE*, Part Two.

The Headmaster holds routine meetings with the DSL, and they will meet more frequently when significant safeguarding matters arise.

Allegations against members of staff, volunteers, or governors are to be reported to the Headmaster (not the DSL) and so he / she has overall responsibility for managing safeguarding matters that concern staff (see further Section 13 below). The Headmaster may choose to ask the DSL to support or deputise for managing certain cases involving staff, should he / she think it appropriate.

### The Governors

The governors will have oversight of safeguarding, ensuring that the School is fully compliant with all statutory guidance, and that it publishes and implements an appropriate policy each year. All governors will receive and read an annual safeguarding report, which will be presented to the Full Governing Board by the DSL.

The governors will provide a Safeguarding Governor with specific responsibility to oversee this aspect of School practice, further scrutinise CP and safeguarding matters, and act as a liaison between the DSL and the Board of Governors. The Safeguarding Governor will review the School's policy (and any interim updates), and work with the DSL to ensure that policy is suitable for adoption and publication by the School.

The Chair of Governors will ensure the overall effectiveness of the governors in providing oversight of CP and safeguarding matters at RBC. Should there be concerns about the conduct of or allegations against the Headmaster, these should be reported directly to the Chair of Governors. If there are concerns about members of staff, volunteers, or governors, and the Headmaster is unavailable, then such concerns should be directed to the Chair of Governors.

## **Identifying Issues, Listening to Pupils and Reporting Concerns**

The School promotes a proactive culture in safeguarding and child welfare matters, especially where there is a possibility that a child or young person may be at risk of significant harm. The School takes an open and accepting attitude towards children as part of its responsibility for pastoral care. The School hopes that parents and pupils will feel free

to talk about any concerns and will see the School as a safe place, if there are any difficulties at home. Staff will feel supported in safeguarding and feel able to raise concerns.

Children's worries and fears will be taken seriously if they seek help from a member of staff. This may lead to a referral to an external agency, to safeguard a child's welfare. Any suspicion that a pupil is at risk of significant harm through abuse will initiate a formal notification to the relevant authorities. The same meaning of 'significant harm' is applied in this policy as in the *Children Act, 1989* in that:

- 'Harm' means ill-treatment or impairment of health or development, including impairment suffered from hearing or seeing the ill-treatment of another.
- 'Development' means physical, intellectual, emotional, social, or behavioural development.
- 'Health' means physical or mental health and 'ill-treatment' includes sexual abuse and ill-treatment that is not physical.

It is important that all staff, volunteers, and governors recognise common indicators and types of abuse (as per Section 5, above), and accept their responsibilities to communicate concerns. There may be uncertain or ambiguous cases, where it is not immediately clear whether a matter is a safeguarding concern – in such cases, the approach at RBC is: *if in doubt, pass it on*. The Safeguarding Team are always happy to discuss concerns and would rather have more information than less. Where there is a case of suspected abuse, this must always be passed on immediately to the DSL.

Concerns about a child may arise from an adult's or peer's observation of them, noting a change in appearance, mood, or behaviour. However, concerns may also arise from a child directly telling an adult of their experiences. For such cases, here is practical advice for staff:

- Stop any distractions or other activities, and listen in a focused way
- Assure the pupil that you are happy to listen and to help
- Listen carefully and with an open mind; give the child time and do not fill silences
- Do not bombard the child with questions and use them carefully. Consider using open questions (e.g., what else?) or closed factual questions (e.g., what date/time was that?)
- Never ask leading questions, which may compromise investigations
- Do not attempt to investigate the matter yourself
- Do not promise confidentiality and clarify that abuse must always be reported
- Reassure the child that they have done the right thing in confiding in you
- Produce a simple, accurate written record of the conversation as soon as possible
  - Use the child's own words and base it on what you have heard
  - Keep to the facts; try to include everything, check for gaps, errors
  - Sometimes, the child will feel able to help you produce the summary
  - Do not offer your own opinions or interpretations
  - Provide the date, time, and signature on your record
- Communicate the matter to the DSL immediately: in person, on the phone, via email
  - If the DSL is unavailable, contact a DDSL
  - The Pastoral Secretary (in Messer Building) can help to contact the DSL
  - Communication in person / on the phone is preferable, as it is immediate
  - Mark all safeguarding disclosure emails as urgent, address the DSL

Any supplementary information or evidence you have (e.g., images, messages) should also be passed on promptly, along with the concern report. Do not retain copies of these items.

If the child is in a vulnerable state or at risk at the time in any way, always ensure their immediate safety and well-being, asking other RBC staff for assistance where necessary.

There are respite spaces available within the School and a pastoral triage rota, which is managed by Pastoral Secretary.

At this point, there would be no further action to take, unless requested by the DSL.

## Referrals

When receiving reported concerns about the welfare of a child, the DSL and / or DDSLs will consider carefully all the relevant information to decide an appropriate course of action. Specifically, a referral to children's services might be made considering the following factors:

- The nature and seriousness of the complaint
- Local thresholds, or advice from a 'no-names' conversation with professionals
- The best interests of the child
- The child's wishes and feelings

If the decision is made not to refer a matter, the situation will still be kept under review and a referral might be made later, particularly if circumstances do not improve or deteriorate.

In making a referral, the DSL will telephone the relevant Local Authority's children's services and talk through the specifics of the concern, then following-up in writing. Confirmation of a decision or action should be received from the Local Authority within one working day; if this does not come through then the DSL will follow up again by telephone. If a referral is made by a DDSL or other member of staff, they should inform the DSL as soon as possible. The DSL will also continue to follow-up on open cases, sharing information, or alerting children's services if the situation seems unchanged or worse.

Referrals may also be made by the DSL to the Channel programme, for concerns about radicalisation. Following the same principles to the ones above, he / she will carefully consider the full range of information about the child and the circumstances of the concern, with cases kept under constant review.

## Communication, Information Sharing and Record Keeping

Safeguarding matters are by their nature sensitive and often complex. There are important demands on the one hand for confidentiality, data security, and privacy (to protect the child) and on the other hand for raising awareness and sharing information (to enable parties to support children effectively). The DSL will follow the law, advice from external agencies, and will form careful judgements as to the way safeguarding information is managed and shared.

General principles for information sharing – the School will cooperate with external agencies and share information appropriately, to ensure the best possible support for children. Requests for information will be dealt with promptly and accurately. Similarly, the cooperation with external agencies requires that the DSL / DDSL is proactive in seeking relevant information held by, for example, children's services or the police.

All other considerations for sharing information will be secondary to the child's best interests and safety. However, it remains important to manage data and it should not be shared indiscriminately. The following principles will help in decision-making:

- Be open and honest about what is shared, why, how, and when
- It is best to share information with consent, but sometimes necessary without
- Consider the security of the means of communication and storage by the recipient
- In difficult cases, take expert advice on the appropriateness of information sharing

- Keep a record of decisions to share information or not, and why they were made
- Follow the principles: necessary, proportionate, relevant, accurate, timely, secure

More detailed guidance may be found in the Government advice *Information Sharing, 2018*.

Informing parents – where possible, it is important to keep parents informed of CP and safeguarding concerns regarding their children, as parents will play a key role in helping to safeguard the child. Cooperation and openness are always best working practices. The School's safeguarding policy and practice is transparent and published online, and parents are welcome to discuss any aspect of this policy with the Safeguarding Team.

Where a referral is made concerning a child, parents should be informed as soon as possible. However, parents will *not* be informed if they are alleged perpetrators of or accessories to abuse, or if there is specific advice from external agencies not to do so. Referrals do not require parental consent and will always be considered in terms of the child's best interests. Similarly, as a case progresses, further information will be shared with the parents (or not) according to the principles above.

Informing staff – staff have a legitimate interest in understanding the needs of the children they look after, for example giving them emotional support or avoiding triggers in lessons. However, these interests are balanced by fundamental considerations of privacy, data security, and the child's wishes. The extent to which RBC staff beyond the Safeguarding Team are informed of safeguarding concerns will be judged on a case-by-case basis by the DSL. Wider dissemination of information will only be made where it is strictly necessary, beneficial to the child, and can be managed carefully.

Record keeping – sensitive safeguarding information will be stored on the system MyConcern, and sensitive documents received in hardcopy will be scanned and entered there, and / or attached to the pupil's paper file. MyConcern will be managed by the Pastoral Secretary and the Safeguarding Team. This will be used for logging actions, discussions, decisions (with their reasoning), and communication by RBC staff, as well as official documentation (such as referral forms). Information stored on MyConcern is not accessible to the wider staff body. Less sensitive information about lower-level or general pastoral concerns will be stored on the pupil's file on SIMs.

## **Training and Raising Awareness**

Quality training and regular professional updates provide the cornerstone of effective safeguarding and child protection, and RBC maintains a strong commitment to providing training of the highest level.

All staff, volunteers and governors at RBC receive safeguarding training. Mandatory training is undertaken as a precursor to starting work, in the form of an EduCare course on the following topics: Child Protection and Safeguarding (for all staff); Online Safety; Peer-on-Peer Abuse; the Prevent duty (for those working directly with children). Those courses will then be refreshed every three years.

Responsibility for providing safeguarding training will lie with the DSL and will also require cooperation with the HR Manager, the Deputy Head Staff, and the other members of the Safeguarding Team. Further, specific requirements for training include:

- 'Targeted' training for the DSL / DDSL with refreshers every two years
- For all staff, volunteers, and governors: annual update briefings or refresher training
- For teachers, full training every two years (due Sept 2022)

- *NB teachers receive a brief update / refresher in the off year*
- *The Headmaster participates in the same training as other teachers*
- For those joining part-way through a school year, a welcome meeting with the DSL

It is also a general expectation that members of the Safeguarding Team and other pastoral staff (such as Heads of Year) will undertake additional training or self-directed learning as part of the wider course of their professional development, to give them expertise in specific issues (e.g., online safety, preventing bullying, etc.), using this to enhance the overall knowledge-base of the School's pastoral care.

The HR department, liaising with the DSL and Pastoral Secretary, will keep records to ensure that all staff participate in statutory training.

As part of and alongside that training, all staff are expected to maintain familiarity with:

- Policies and systems within the School covering CP and safeguarding, pupil behaviour, staff conduct, whistleblowing, and internet safety
- The School's response to children missing education
- The local early help process
- The referral process to children's services; statutory assessments (Section 17; 47)
- What to do if a child discloses that he / she is being abused

The DSL will be available to clarify any of these matters and answer questions. The DSL and DDSLs will also maintain an enhanced level of understanding, including:

- The processes for early help and statutory intervention, including local criteria
- Local Authority child protection cases conferences: how to contribute effectively
- Local contexts of safeguarding issues
- The specific needs of children, including those with SEND or young carers
- Data protection regulations and how they relate to safeguarding matters
- The Prevent duty and risks of radicalisation

The School will promote a culture of awareness and understanding of safeguarding issues, across the staff body, but also among the pupils and the wider community. Pupils will be informed clearly and consistently of their ability to disclose and raise concerns, and how to do so. The School will provide a suitable PSHE curriculum for all pupils, which will enable them to understand and manage risks, and to keep themselves safe. This will include (but not be limited to) such topics as:

- E-safety
- Bullying
- Mental health
- Sex and relationships
- Equity and inclusion
- Substance abuse

## **Recruitment and Induction**

The School will, through its recruitment procedures, ensure that all staff, volunteers, and governors are suitable to work with children and young people. To enable this, they will be appropriately selected, screened, trained, and supervised. The School will implement safer recruitment practices, in accordance with its Recruitment, Selection and Disclosure policy.

Senior staff are trained to ensure that safer recruitment questions are asked at employment interviews.

Recognising that individuals who might pose a risk to children may seek access to them through voluntary roles in schools, the School will employ the same level of checks for suitability on volunteers. Where a parent or other volunteer works on behalf of the School on a one-off basis (i.e., is not vetted), he / she will only do so under the direct supervision of staff.

On receiving an offer of employment, in addition to completing background checks, new members of staff will be required to complete safeguarding training, and to read and accept the School's CP and Safeguarding policy, Staff Code of Conduct, and the relevant sections of *KCSIE*. They will be expected to provide a prompt return of acknowledgement, in a timescale agreed with the HR department and / or the Pastoral Secretary.

On commencing employment, as part of the induction of staff, the School will provide copies (in hard or digital format) of:

- The Child Protection and Safeguarding policy
- Information identifying the DSL and Deputy DSLs
- The Staff Code of Conduct
- The Whistleblowing policy
- The Behaviour, Rewards and Sanctions policy
- The Pupils Missing Education policy
- The relevant sections of *KCSIE* as identified in this policy

New staff also receive briefings as part of their induction day, on joining Blue Coat. The induction sessions include (naming those relevant to safeguarding considerations):

- Child Protection and Safeguarding policy
- Staff Handbook and Staff Code of Conduct
- Medical procedures and use of adrenal injector pens
- Tutor standards, registration and attendance, SIMS
- Pupil wellbeing and positive mental health
- Health and Safety
- Learning Support

### **Allegations Against Staff and Volunteers**

- All staff are advised to be circumspect and to avoid putting themselves in a situation which poses a risk to a child or risks giving rise to an allegation of abuse. Guidance is given to staff as to how to manage these risks in the Staff Code of Conduct. The points in this section of the policy apply to all staff, supply staff, volunteers, and governors.

The School will follow-up on all allegations swiftly, fairly, and in accordance with the law / guidance. Allegations might include committing an offence against a child, putting a child at risk of harm, or behaving in such a way as to call into question their suitability to work with children. The School will follow the guidance given in Part Four of *KCSIE*.

Allegations against members of staff (including against the DSL or other senior members of staff) should be made direct to the Headmaster (without informing the member of staff). The Headmaster manages allegations against staff but, in his absence, the Chair of Governors should be contacted. If an allegation is made against the Headmaster, the Chair of Governors should be contacted direct (without informing the Headmaster). Contact

information can be found above in Section 3 and the Headmaster's Secretary can assist in making contact.

Allegations will be referred immediately to the local LADO or (for serious matters) Police. The School will not investigate allegations unless specifically advised to do so by the authorities. Similarly, the staff subject of the allegation will not be informed until / unless the LADO advises. When referring concerns to the LADO, the Headmaster will participate in discussions as to the nature and management of the case. Discussions should be recorded in writing, leading to an agreed course of action, including any communications to the member of staff concerned and / or the parents of the child. These decisions may result in the School deciding to suspend a member of staff or putting in place other measures to manage risks. Suspension will not be automatically implemented and will only occur where there is no suitable alternative.

The School will report promptly to the DBS any person (whether employed, contracted, a volunteer or student) whose services are no longer used for regulated activity and where the DBS referral criteria are met, that is, they have caused harm or posed a risk of harm to a child. Where a teacher has been dismissed, the School will consider whether a referral to the Teaching Regulation Agency is required, reading carefully the advice issued in *Teacher Misconduct, 2012* and the TRA website and, if necessary, taking specialist legal advice.

## **Bibliography and Recommended Resources**

### Government Guidance and Law

Statutory guidance: *Keeping Children Safe in Education (2021)*:

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Statutory guidance: *Working Together to Safeguard Children (2018)*:

<https://www.gov.uk/government/publications/working-together-to-safeguard-children-2>

Statutory guidance: *Prevent Duty Guidance (2015)*:

<https://www.gov.uk/government/publications/prevent-duty-guidance>

Statutory guidance: *Disqualification under the Childcare Act (2006)*:

<https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006>

Guidance: *What to do if you are Worried a Child is Being Abused (2015)*:

<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>

Guidance: *Sharing Nudes and Semi-Nudes: Advice for Education Settings Working with Children and Young People (2020)*:

<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

Guidance: *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers (2018)*:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/721581/Information\\_sharing\\_advice\\_practitioners\\_safeguarding\\_services.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf)

TRA guidance collection: *Teacher Misconduct (2012)*:

<https://www.gov.uk/government/collections/teacher-misconduct>

UK Legislation: *Children Act (1989)*:

<https://www.legislation.gov.uk/ukpga/1989/41/contents>

UK Legislation: *Sexual Offences Act (2003)*:

<https://www.legislation.gov.uk/ukpga/2003/42/contents>

Miscellaneous / Other

MyConcern public website:

<https://www.myconcern.co.uk/>

NSPCC, 'What is Child Abuse?' (2018):

<https://www.nspcc.org.uk/what-is-child-abuse/>

News report, *Reading Chronicle* (27<sup>th</sup> May 2021):

<https://www.readingchronicle.co.uk/news/19330539.berkshire-county-lines-drug-operation-leads-80-arrests-40k-seized/>

Children's Society Report: *Counting Lives* (2019):

<https://www.childrensociety.org.uk/what-we-do/resources-and-publications/counting-lives-report>

Recommended Resources for RBC Staff

Berkshire West Safeguarding Children Partnership:

<https://www.berkshirewestsafeguardingchildrenpartnership.org.uk/scp>

EduCare (the School maintains a wide-ranging suite of safeguarding related courses):

<https://www.educare.co.uk/>

The Children's Society: <https://www.childrensociety.org.uk/>

Mind: <https://www.mind.org.uk/>

NSPCC: <https://www.nspcc.org.uk/> - includes useful guidance, 'When to Call the Police'

Thames Valley Police (includes news and briefings): <https://www.thamesvalley.police.uk/>

ThinkUKnow: <https://www.thinkuknow.co.uk/professionals/>

Zurich safeguarding resources: <https://newsandviews.zurich.co.uk/risk-guides/safeguarding-risk-resource/>

KCSIE 2021 summary: <https://safeguarding.network/keeping-children-safe-education/>

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## Annex: Summary of Changes in *KCSIE, 2021*

The main Government statutory guidance has been updated again for the school year beginning September 2021. The changes are fully summarised in Annex G of *KCSIE*, and it is recommended that staff review the table there. As a summary, main points of change include:

- Reference to new DfE advice: *Sexual violence and sexual harassment between children in schools and colleges*.
- A condensed Part One is now contained within Annex A, so that staff who do not work directly with children may, if their institution decides, read Annex A each year only. NB at Blue Coat we have decided that all staff should read the full Part One.
- Stronger emphasis upon peer-on-peer abuse and support for those reporting sexual abuse / harassment (i.e., that they should not feel they are 'creating a problem' in reporting abuse).
- Reference to the new 2020 UKCIS guidance on how to respond to incidents of sharing nudes and semi-nudes.
- Additional information on child criminal exploitation, child sexual exploitation, mental health, peer-on-peer abuse, and serious violence, as well as school record keeping.
- New section on online safety, including remote learning.
- Additions and clarifications to Part 5: 'Child on child sexual violence and sexual harassment' and links to new (2021) DfE guidance (mentioned above).

NB – for a more detailed summary of changes, see:

<https://safeguarding.network/keeping-children-safe-education/>

## Annex: Management of Non-Recent Abuse Allegations and Cases

Context: Reading Blue Coat is a long-established school with an engaged body of former pupils ('Old Blues'). For much of the School's history, it also operated as boarding school, with the School reverting to day-only in the 1990s. Therefore, many Old Blues will have had significant experiences of both the daily life of the School and the residential aspect of living on-site. Although RBC has long prided itself on providing a happy and safe environment for learning, it is also the case that Old Blues may have suffered abuse during their time in the School. For this reason, the following management plan is provided to guide RBC staff in the circumstance of receiving information about potential non-recent abuse (such as, historic sexual abuse). It is hoped that Old Blues will feel able to share any concerns about their school days, trusting the School to manage such concerns proactively and empathetically.

This plan is shaped by the analysis of historic abuse provided in the following report and will be cited below as 'Reference A': *Farrer & Co. Child Sexual Abuse in Schools: Lessons from History, Guidance for the Future*.

<https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/child-sexual-abuse-in-schools---lessons-from-history-guidance-for-the-future.pdf>

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On receipt of information about non-recent abuse it is the School's policy to undertake the following:

Log the matter in the Safeguarding Risk Register <i>The folder will be stored in the Headmaster's office</i>	<b>Record of Actions Taken</b>
Make a record of the report.	<i>Attach record of the report.</i>
Consider taking telephone advice from one or more of the following on the reported abuse:  1) LADO  2) Solicitors  3) Police	
Establish the appropriate way to manage the report and particularly what needs to be said to the person reporting the instance and/or the reported recipient of the abuse.	
Investigation: The School has a responsibility to investigate for its own sake. It cannot be left to the Police [See Pg. 16 of Reference A]. Legal advice may be sought to guide the School if required.	
Reporting: The School will refer concerns to external agencies and may do so even for apparently low-level concerns, on the principle that such concerns could be seen in light of information held by other agencies. (See Reference A). Specifically:	
To the Police: any historical allegations of abuse will be referred to the Police by the Headmaster or the Bursar	
To the LADO: The School should form a habit of referring concerns, including low-level concerns, to the LADO. Alleged perpetrators of abuse may still be working with children, even many years later. The referral will either be made by the Headmaster or delegated to the DSL.	
Administratively: The Bursar will notify the Charity Commission The Bursar will notify the Chairman of Governors The Bursar will notify the Insurer The Bursar will warn the School's PR advisor and, if appropriate, advice will be sought	
Follow Up Action: the list above will result in a decision by the Headmaster on what action should be taken to follow up on the initial report. All actions should be logged in the Safeguarding Risk Register.	

## **Annex: RBC Low-Level Concerns Annex**

### Aims and Definition:

A 'Low-Level Concern' is a concern about a member of staff that does not meet the threshold of harm. As part of the update to *KCS/E* 2021, Schools must formally distinguish between concerns that meet threshold and those that do not, and they must also report, record, and deal with the low-level concerns appropriately.

It is important that we address low-level concerns as a School, to promote an open and transparent culture, take early intervention on concerning behaviour, minimise the risk of abuse, and support staff in staying within professional boundaries.

It should be emphasised that the intent of this policy is to help staff, rather than catch them out, as early intervention and logging of concerns may help to prevent more serious issues arising in the future. Staff can also protect themselves by being open about any mistakes they make that fall under the category of low-level concerns

### Examples of Low-Level Concerns:

Low-level concerns do not meet the threshold of harm, but they include behaviours which are not consistent with the School's Values or with the Staff Code of Conduct. They may occur both within and outside of work.

It is not possible to provide an exhaustive list and the context of an action may affect the level of concern. However, the School seeks to identify *all* concerning behaviour and log it, even if an infringement may not, on the face of it seem that serious. This consistency and universal approach contributes to the idea of an open culture. Examples could include:

- Using inappropriate language, such as swearing in the presence of pupils
- Speaking to a child alone in a secluded area, such as an empty building or in the woods
- Being overly friendly or informal, such as discussing very personal matters as friends
- Mismanaged and inappropriate personal social media, such as leaving party photos, or very personal text posts, open to public view

Concerns will still be logged as per the process set out below, even if they are judged to be accidental or inadvertent – again, for the principle of openness and consistency.

Any example which caused harm to a pupil would fall under the principles for concern about staff as mentioned in the main body of the policy. NB – 'harm' for these purposes should be understood as any of the following: (1) acting in a way that has or may have caused harm to a child, (2) possibly committing a criminal offence, (3) behaved towards a child in a way that suggests they may pose a risk of harm, (4) behaved in a way which suggests they may not be suitable to work with children. For grey areas, advice may be sought from the LADO as to whether a low-level concern in fact constitutes 'harm'. Any breach of the RBC Staff Code of Conduct will also be considered as to whether it constitutes a 'low-level concern' or a concern which meets threshold, and so this annex must be read in conjunction with that Code.

### Implementation:

The School recognises that low-level concerns may, to some extent, represent a challenging concept for staff and could lead to anxiety that their behaviour is being actively monitored and policed. While acknowledging this challenge, it should be reaffirmed that the primary intent of this policy is to perpetuate a safe and positive culture within the School, which

protects both staff and pupils. As such, staff should feel reassured that the policy protects them and further aims to make it easier for them to comply with professional norms and the Code of Conduct. No assumptions will be made, and it is the explicit desire of the School Governors and SLT to promote a culture of openness and honest, rather than one of suspicion or accusation.

To assist in the implementation of this policy, it should be emphasised that:

- Staff are very welcome to discuss the content of this policy with the DSL
- It is appropriate to ask for clarification of 'grey areas' from the DSL
- Dealing with emerging inappropriate conduct in the early stages will make it less likely that serious misconduct cases will develop
- Welfare conversations will also be consistently offered to any member of staff who is logged for a low-level concern
- If appropriate, further training would be offered to members of staff who are subject to low-level concerns
- Low-level concerns will be dealt with, and decisions communicated within 7 days, to avoid unsettling and open-ended investigations. Delays will be rare and only for reasons that cannot be avoided (e.g. staff absence). If a concern must be escalated beyond a low-level concern, then this may take longer.

#### Self-referral:

Staff are warmly encouraged to self-refer for low-level concerns, to help create a culture of openness and help to manage situations which could be subject to misinterpretation. Some self-referrals will be neutral situations. A simple example for such cases would be making accidental physical contact with a pupil.

However, where a member of staff realises they have committed low-level misconduct, they are still strongly advised to self-refer, for the benefit that honesty brings to any later discussion.

In many ways, a practice of self-referral is the best for the culture of the School, as it is implicitly trusting and reduces the pressure on other staff reporting concerns about their colleagues.

#### Reporting and recording concerns:

This policy annex is equally applicable to staff, supply staff, governors, contractors, and volunteers, both as the subjects of potential concerns and as those who have a responsibility to share concerns.

The Headmaster, supported by the Second Master and DSL, will ensure a supportive culture for hearing concerns, being encouraging, listening carefully, not jumping to conclusions, and discussing cases in an open-minded and non-judgmental way.

All concerns should be reported in writing to the Headmaster, including the date and times of events, and the date and times of the writing of the report. Those communicating concerns may choose to be treated anonymously, as far as it is possible to do so. Should the Headmaster be the subject of a low-level concern, this should be reported to the Chair of Governors, as per the reporting of any safeguarding concerns (as set out above). Records will be kept securely in a file in the Headmaster's office, accessible only to the Headmaster, Second Master, and DSL. Information about cases may be shared with other

members of the SLT, as per the Headmaster's judgment as to the best way to manage a situation.

Whenever a low-level concern is logged, the history of any other concerns specific to that individual will be considered consistently, to ensure that any patterns of behaviour would be spotted.

Any concerning patterns of behaviour or concerns rising to the threshold of significant harm would be referred to the LADO for further consideration, as per the judgment of the Headmaster.

Only substantiated issues relating to misconduct or poor performance would be included in an employment reference (see further *KCSIE 2021*, p. 97).

#### Responding to concerns:

The Headmaster (or deputising, if necessary: the Second Master or DSL) will respond to reported concerns by speaking directly to the individual and any witnesses.

All information will be considered carefully to arrive at a fair and proportionate judgement. Any decisions will be offered with a clear, written rationale.

This response to low-level concerns is an extension of the processes already set out in the RBC Staff Code of Conduct.

#### This policy annex and other, related concerns:

While this policy annex is specific to the reporting of concerns about adults, by adults, the principles set out here are general good practice, and they should be used for other types of concerns. For example:

- Children reporting concerns about adults
  - Low-level concerns about adults reported by pupils should be referred on to the Headmaster, so they can be treated in accordance with this policy annex
- Children reporting concerns about their peers (peer-on-peer abuse)
  - Concerns of this nature should follow the peer-on-peer abuse guidance set out in the policy above; the DSL will ensure that low-level concerns about peer-on-peer behaviour will be consistently logged through the mechanisms set out in the Behaviour, Rewards and Sanctions policy; patterns of behaviour will be monitored by Heads of Year
- Children and adults reporting concerns about adults' behaviour towards other, especially vulnerable, adults
  - Low-level concerns about adult-on-adult behaviour will be treated in the same way as concerns about adult-on-child behaviour as set out in this annex (while acknowledging, in a school, such concerns may be less frequent).

#### Resources:

*KCSIE 2021*, pp. 94-98:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1021914/KCSIE\\_2021\\_September\\_guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1021914/KCSIE_2021_September_guidance.pdf)

'Developing and Implementing a Low-Level Concerns Policy', Farrer, September 2021:

<https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/low-level-concerns-guidance-2021.pdf>