EATON HOUSE SCHOOLS

SAFEGUARDING AND

CHILD PROTECTION

POLICY AND PROCEDURES

This policy applies to Eaton House Schools including EYFS

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	Mrs Fiona Bellamy-Loughton (DSL, EHTM Pre-Prep)
	Mr Paul Russell (DSL, EHTM Prep)
	Mr Brendan O'Keeffe (DSL, EHB)
	Mrs Sarah Segrave (DSL, Eaton House Schools)
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Contents

Safeguarding & Child Protection Policy

Safeguarding & Child Protection Policy

Introduction

There is a whole Schools commitment to safeguarding of all our children and young people. This extends from our board of governors, senior leadership team and everyone who works and volunteers at the Schools. All staff have a duty to maximise the welfare, health, and safety of anyone in our care and to take immediate action to protect them from harm or any risk of harm. All staff understand that safeguarding is "everyone's responsibility" and must act swiftly when any concerns are disclosed, or events witnessed.

Safeguarding and promoting the welfare of children is defined as helping and supporting children and young people with their needs as soon as the problem arises, protecting children from maltreatment, whether that is within or outside the home including online, preventing impairment of health (both physical and mental) and/or development, ensuring that the children and young people grow up in the provision of safe and effective care and optimising children's life chances.

All children, without exception, have the right to protection from abuse regardless of disability, sex, gender reassignment, race, religion or belief, or sexual orientation (Equality Act 2010). At Eaton House Schools we recognise that these groups (including those who identify as LGBTQ+) may lack trusted adults with whom they can be open, and works to reduce any additional barriers they may face and provide a safe space for them to share any concerns with staff.

We recognise our duty to children in need of additional support and to children at risk or harm, including the additional vulnerability of pupils with SEND or certain health conditions. We recognise that children with SEND can be more prone to peer group isolation than other children and provide extra pastoral support for those children, if appropriate.

The Schools recognise their responsibilities for all aspects of safeguarding and child protection and the safety of pupils is always accorded the highest priority. Every child and young person should feel safe and protected from any form of abuse, neglect or exploitation including from using technology. Everyone who encounters children, and their families (or carers) has a role to play in safeguarding and should ensure their approach is child centred: this means considering at all times what is in the best interests of the child.

Eaton House Schools will operate safeguarding procedures in line with our locally agreed multi-agency safeguarding arrangements put in place by our safeguarding partners.

This Policy is the responsibility of the Compliance Manager, Principal and Designated Safeguarding Leads (DSLs) and their deputies and is reviewed annually by the Board of Governors as part of Eaton House Schools Annual Safeguarding Review or when legislation or government guidance dictates.

It has been updated with having due regard to *Keeping Children Safe in Education* (KCSIE) September 2024, the governments' statutory guidance "working together to safeguard children" as well as requirements from our local Councils' Safeguarding Children's Partnership.

Safeguarding & Child Protection Policy

This policy is available on Eaton House Schools website:

https://www.eatonhouseschools.com/ and it is also available on request from

Eaton House The Manor office on 02079246000

Eaton House Belgravia office on 0207730 9343

or by email compliance@eatonhouseschools.com

The policy is available in large print or another accessible format if required.

The procedures as outlined in this policy apply wherever our Eaton House Schools staff, volunteers or contractors are working with or near our pupils even when this is away from our organisation, for example on an educational visit or residential trip.

This policy applies to all children in the Eaton House Schools including those in the EYFS.

Relevant Statutory and Non-Statutory Advice

This policy is written with regards to both the advice below and in Appendix 1, section 28 of this policy:

Keeping Children Safe in Education (KCSIE), DfE, 2024	Keeping Children Safe in Education
Disqualification Under the Childcare Act 2006 – updated **August 2018**	https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006/disqualification-under-the-childcare-act-2006
Working Together to Safeguarding Children, DfE (February 2024)	Working Together to Safeguard Children
Working Together to Improve School Attendance, DfE (August 2024)	https://www.gov.uk/government/publications/working-together-to-improve-school-attendance
DfE statutory guidance 'Children missing education'	https://www.gov.uk/government/publications/children-missing-education
The Independent School Standards (England) Regulations, DfE, 2014**. Updated 2019**	https://assets.publishing.service.gov.uk/media/5cd3fc2fe5274a3fd6ee74b0/Independent_School_Standards-_Guidance_070519.pdf
EYFS Framework**, 2024**	Early years foundation stage (EYFS) statutory framework - GOV.UK (www.gov.uk)
DfE Guidance What to do if you're worried a child is being abused **(March 2015)**	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf

Safeguarding & Child Protection Policy

RSE and Health Education Updated 13th September 2021	Relationships Education, Relationships and Sex education (RSE and Health Education (2019, Updated September 2021
Prevent Duty 2015 – Updated March 2024	Prevent duty guidance: England and Wales (2023) - GOV.UK (www.gov.uk)
NSPCC E-Safety Guidance for Schools **January 2024**	Online safety (e-safety) and schools | NSPCC Learning
Sharing nudes and semi-nudes: advice for education settings working with children and young people, **DfE, March 2024** (Non-statutory advice)	Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK (www.gov.uk)
Guidance that any child investigated by the police whether in or out of School should have an appropriate adult with them. **November 2020.**	https://cscp.org.uk/training/pace-child-sexual-exploitation-free-online-awareness-tool/ https://www.gov.uk/government/publications/pace-code-c-2019
Children Act 1989	Children Act 1989 (legislation.gov.uk)
Children Act 2004	Children Act 2004 (legislation.gov.uk)
Childcare Act 2006	https://www.legislation.gov.uk/ukpga/2006/21
NSPCC advice on protecting children with SEN and disabled children and young people	https://learning.nspcc.org.uk/safeguarding-child-protection-schools/safeguarding-children-with-special-educational-needs-and-disabilities-send https://learning.nspcc.org.uk/safeguarding-child-protection/deaf-and-disabled-children#risk-and-vulnerability-factors

Safeguarding & Child Protection Policy

Relevant Policies

This safeguarding and child protection policy and procedure has also been developed by taking account of the following Eaton House Schools policies below and should be read in conjunction with them and are attached below.

ICT Acceptable Usage Policy
Anti-Bullying Policy (Pupils)
Pupil Behaviour, Discipline and Exclusions Policy ETHM Nursery, Girls, Pre-Prep, Prep, EHB Pre-Prep, Prep and EYFS
Missing Child Policy
Staff Behaviour Safeguarding (Code of Conduct) Policy
Cyberbullying Policy
Health and Safety Policy
Lone Worker Policy
Child on Child Abuse Policy
Low Level Concerns Policy
Selection, Recruitment and Disclosure Policy
Trips and Visits Policy
Sharing of Concerns (Whistleblowing) Policy
Attendance Policy

Any questions regarding this policy should be directed towards the Designated Safeguarding Leads in the first instance.

Safeguarding & Child Protection Policy

Key Personnel for Safeguarding and Child Protection

Designated Safeguarding Leads (DSLs) Eaton House the Manor

Eaton House the Manor Nursery	Eaton House the Manor Girls'
Mrs Roosha Sue (Head Teacher) During School Hours: 020 7924 6000 Ext: 1400 E-mail: RSue@eatonhouseschools.com	Mrs Claire Fildes (Head Teacher) During School Hours: 020 7924 6000 Ext:1500 E-mail: cfildes@eatonhouseschools.com
Eaton House the Manor Pre-Prep Mrs Fiona Bellamy-Laughton (Deputy Head) During School Hours: 020 7924 600 Ext: 1230 E-mail: flaughton@eatonhouseschools.com	**Eaton House the Manor Prep** Mr Paul Russell (Assistant Head Pastoral) During School Hours: 020 7924 6000 Ext: 1268 E-mail: prussell@eatonhouseschools.com

Deputy Designated Safeguarding Leads (DDSLs) Eaton House the Manor

Eaton House the Manor Girls'	Eaton House the Manor Prep
Mrs Kirsten Bond (Deputy Head) During School Hours: 020 7924 6000 Ext: 1118 E-mail: kbond@eatonhouseschools.com	Ms Sarah Allen (Senior Deputy Head) During School Hours: 020 7924 6000 Ext:1215 E-mail: sallen@eatonhouseschools.com
Eaton House the Manor Pre-Prep Mr David Wingfield (Head Teacher) During School Hours: 020 7924 6000 Ext:1300 E-mail: dwingfield@eatonhouseschools.com	

Eaton House Belgravia

Designated Safeguarding Lead (DSL) Eaton House Belgravia	Mr Brendan O'Keeffe (Deputy Head Teacher) During School Hours 020 7730 9343 Ext: 2021 E-mail: bokeeffe@eatonhouseschools.com
Deputy Designated Safeguarding Lead (DDSL) Eaton House Belgravia	Mr Ross Montague (Head Teacher) During School Hours 020 7730 9343 Ext: 2022 E-mail: rmontague@eatonhouseschools.com

Safeguarding & Child Protection Policy

Designated Safeguarding Leads (DSLs) Eaton House Schools

Mrs Sarah Segrave (Principal) 020 7924 6000 Ext: 1203 Email: ssegrave@eatonhouseschools.com	Mr Liam Corbett (Bursar) 020 7924 6000 Ext: 1232 Email: lcorbett@eatonhouseschools.com
Mrs Sophie Boella 07523 685 221 Email: nurse@eatonhouseschools.com	

Designated Safeguarding Leads can be contacted by phone during school hours.

Outside school hours please email the Designated Safeguarding Lead, however if someone is at serious risk, please contact the police on 999.

Nominated Safeguarding Governor

Name:	Mark Bailey
Email:	mark.bailey@dukeseducation.com
Registered Address:	Dukes Education, Dukes House, 58 Buckingham Gate, London, SW1E 6AJ
Photo:	

Chairman of Dukes Education

Name:	Mr Aatif Hassan
Telephone:	020 3696 5300
Email:	aatif.hassan@dukeseducation.com
Registered Address:	Dukes Education, Dukes House, 58 Buckingham Gate, London, SW1E 6AJ
Photo:	

Safeguarding & Child Protection Policy

Key External Agencies, Services and Professionals' Contact Details

The telephone numbers of the local agencies responsible for child protection are listed below. They must be contacted within 24 hours of a disclosure or suspicion of abuse.

There is also an online tool [Report child abuse to local council](#) directs to the relevant local children's social care contact number. Please follow this link.

PLEASE NOTE YOU MUST REPORT TO THE LOCAL CHILDREN'S SOCIAL CARE IN WHICH THE CHILD LIVES.

Full local procedures are available from the Local Safeguarding Children Partnership at https://www.londonscb.gov.uk/london-scb-contacts/

The Department for Education – telephone helpline non-emergency advice for staff and governors for extremism	020 7340 7264 Counter-extremism@education.gsi.gov.uk

Advice Lines for Parents / Carers / Pupils

Childline	0800 1111
NSPCC	0808 800 5000
Ofsted's Whistle-blower Hotline	0300 123 3155
Forced Marriage Unit	020 7008 0151 fmu@fco.gov.uk

Our organisation does work with social care, the police, health services and other services, as and where appropriate, in accordance with our statutory responsibility, to promote the welfare of children and protect them from harm.

Please remember anyone can make a referral directly to children's social care or the Local Authority Designated Officer if they believe that a child is at risk or may be at risk of significant harm.

Eaton House Schools staff do not require parental consent to make such a referral to external statutory agencies.

If a direct referral is made by a member of staff, the DSL should also be informed as soon as possible or in their absence the Principal or our safeguarding governor.

Safeguarding & Child Protection Policy

SAFEGUARDING

Kensington & Chelsea and Westminster / Hammersmith & Fulham

Worried about a child or young person?

WESTMINSTER
accesstochildrensservices@westminster.gov.uk
020 7641 4000 / Out of hours 020 7641 6000

KENSINGTON & CHELSEA
socialservices@rbkc.gov.uk
020 7361 3013

HAMMERSMITH & FULHAM
020 8753 6610 / Out of hours 020 8748 8588

YES

Children Social Care

Children and families who are at high risk of harm based on the London Continuum of Need will receive intervention and ongoing support.

UNSURE

MASH

Where the level of risk is not clear, MASH will gather further information to determine next steps for support.

NO

Early Help Hub

Children and families who are a lower risk of harm based on the London Continuum of Need will receive early intervention support through the Early Help Hub.

LADO

Allegations against Staff & Volunteers

If it is alleged that a person who works with children has:

- Behaved in a way that has harmed 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 they may pose a risk of harm to children

Westminster
LADO@westminster.gov.uk
020 7641 7668

Kensington and Chelsea
kclado.enquiries@rbkc.gov.uk
020 7361 3013

Hammersmith and Fulham
lado@ibhf.gov.uk
020 8753 5125

Other Key Contacts
Prevent Duty Hammersmith & Fulham and Kensington and Chelsea:
020 8753 5727   prevent@lbhf.gov.uk / prevent3@rbkc.gov.uk
Prevent Wesminster:
 020 7641 5071 prevent@westminster.gov.uk
LSCP Team
07739 315388
Ofsted:
0300 123 1231 enquiries@ofsted.gov.uk

If a child is at immediate risk, call 999

Safeguarding & Child Protection Policy

SAFEGUARDING WANDSWORTH

[Online Multi-Agency Referral Form](#)

One MASH Contact Number
020 8871 6622 (mash@wandsworth.gov.uk)
Out of hours (evenings/wkd/Bank Holidays 020 8871 6000

THE MASH

Initial Screening

Child Already Open to Children Services

Allocated Social Worker/ Team Manager

REPLY IN ONE WORKING DAY

New case (child may have been previously known)

Immediate Safeguarding Concern

CIN C&F Assessment

Referral is Complex/ Unclear and requires Multi-agency information sharing (as per info sharing policy)

Early Help Pathway

Request for Information 72hour Response

MASH ENQUIRY/ MASH Meeting

Assessment Team on Duty

Strategy Discussion/ Strategy Meeting

CIN C&F Allocation

Early Help

Universal Services
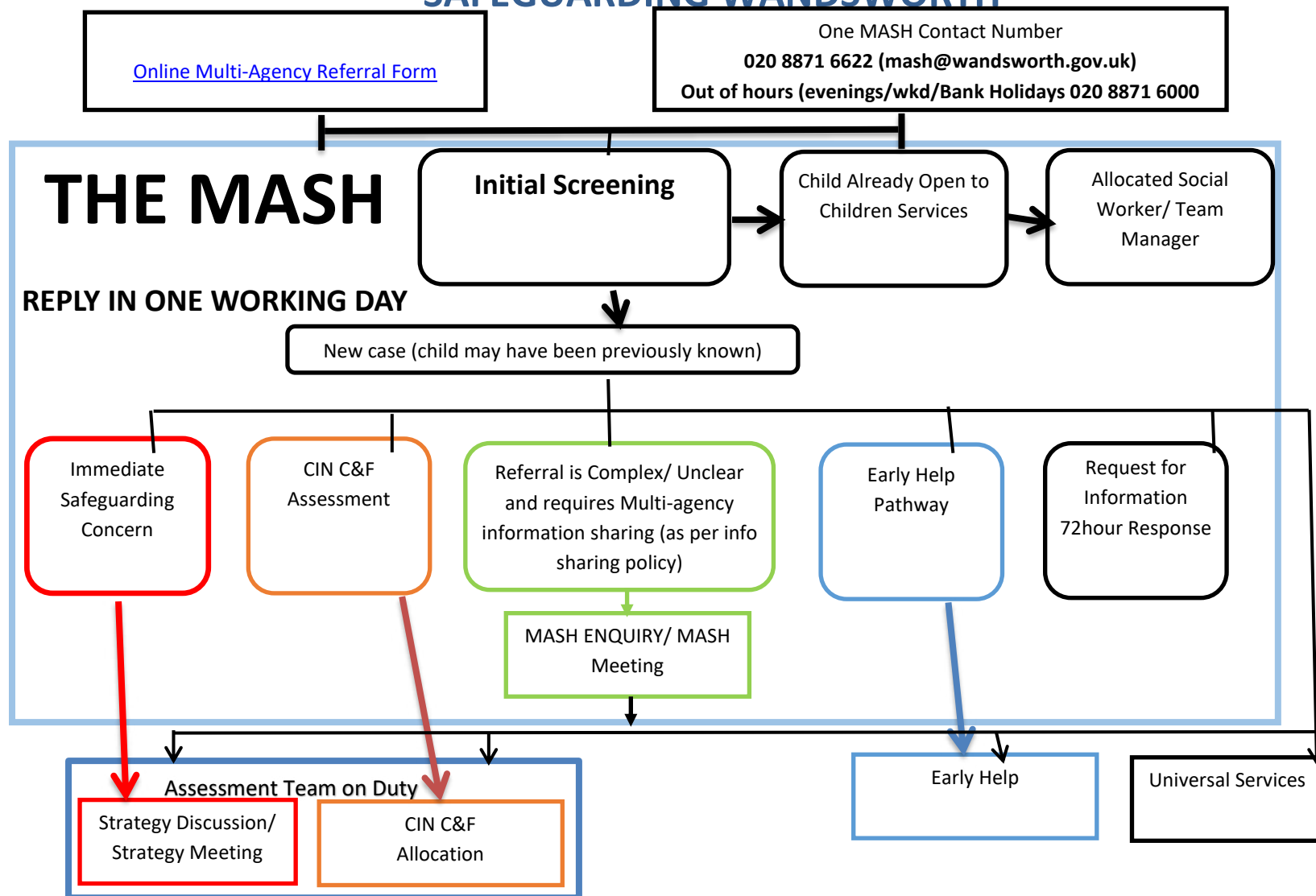
LADO
Allegations against Staff
&
Volunteers

If it is alleged that a person who works with children has:

- Behaved in a way that has harmed 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 they may pose a risk of harm to children

LADO@richmondandwandsworth.g

If a child is at immediate risk, call 999

Other Key Contacts
Prevent Duty: 020 8871 6622
         https://www.gov.uk/government/publications/pace-code-c-2019
Wandsworth Safeguarding Children Partnership: 020 8871 7401   wscp@wandsworth.gov.uk

SAFEGUARDING LAMBETH

First Response Team

If you think a child is at risk of being abused or neglected please contact Lambeth Children's Social Care.

helpandprotection@lambeth.gov.uk   **020 7926 5555**

LADO

Allegations against Staff & Volunteers

If it is alleged that a person who works with children has:

- Behaved in a way that has harmed 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 they may pose a risk of harm to children

LADO@lambeth.gov.uk
020 7926 4679 or 077 2082 8700

All referrals must also be e-mailed to the LADO.

YES

Children Social Care

Children and families who are at high risk of harm based on the London Continuum of Need will receive intervention and ongoing support from the Referral and Assessment Team and Children in Need Teams.

UNSURE

MASH

Where the level of risk is not clear, MASH will gather further information to determine next steps for support.

NO

Early Help Hub

Children and families who are a lower risk of harm based on the London Continuum of Need will receive early intervention support through the Early Help Hub.

The Hub will undertake the initial contact, arrange the first TAC and determine community and targeted services which are best for the family.

If a child is at immediate risk, call 999

Other Key Contacts

Prevent Duty contact the Intergrated Referral Hub: 020 7926 5555   **helpandprotection@lambeth.gov.uk**

Safeguarding Reporting Summary

In all circumstances, no investigation will take place by anyone at the Eaton House Schools until advice has been sought from the Children's Social Care Team or the LADO, who will advise Eaton House Schools on next steps to take.

If You suspect or know that a Child is or may be at risk of Harm **Immediate referral to Children's Social Care through the DSL as below** – **or direct referral if needed.**

⬇

Designated Safeguarding Lead **DSL**
If the DSL unavailable

⬇

Deputy Designated Safeguarding Lead **DDSL**

⬇

If DDSL is unavailable

⬇

Principal **DSL**

⬇

IF DSL, DDSL and Principal are ALL unavailable **Direct Referral without delay**

⬇

Please refer to appropriate Council's Safeguarding Contacts as per diagrams above

If you suspect or know that a crime may / has been committed

↓

DSL

↓

THE POLICE

Direct if DSL is not available

LADO can also be contacted if unable to get through to the POLICE

Concerned about the behaviour of a member of STAFF, volunteer or visitor including the DSL/ DDSLs
(Without informing them)

↓

Head Teachers/Principal

↓

LADO
Direct if the Head / Head Teacher / Principal not available

Advice from LADO to either follow safeguarding procedures or Schools own low level concerns policy.

The Head / Head Teacher / Principal must be informed of the referral as soon as possible after it has occurred if they have been unavailable or the safeguarding governor
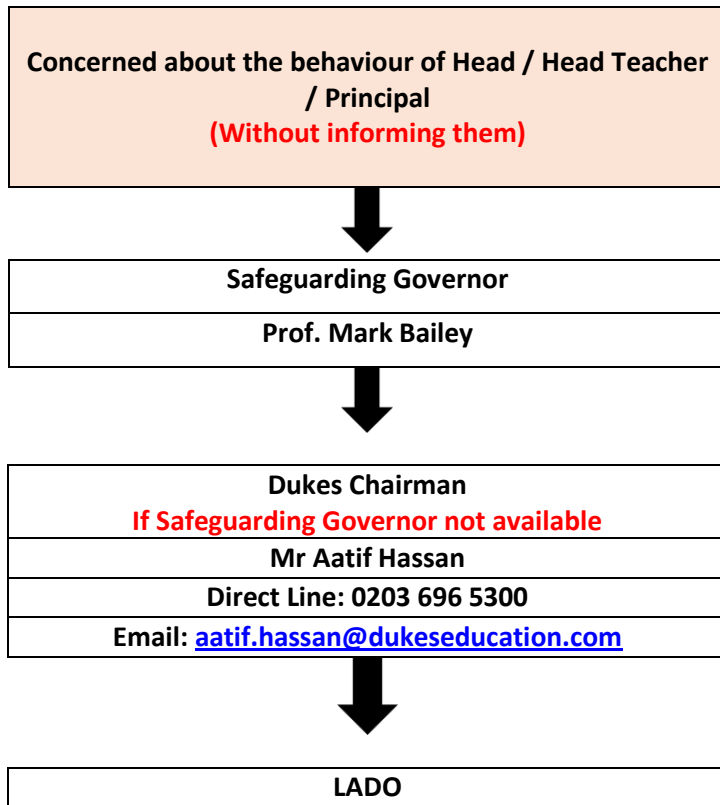
Safeguarding & Child Protection Policy

Concerned about the behaviour of SUPPLY STAFF,
Contractor
(Without informing them)

↓

Head Teachers/Principal

↓

THE LADO
Direct if the Head Teachers/Principal not available

The Head Teachers/Principal will also contact the proprietor of the Supply Agency or Contractor, after advice from the LADO

Advice from LADO to either follow safeguarding procedures or Eaton House Schools own low-level concerns policy

Safeguarding & Child Protection Policy

Concerned about the behaviour of Head / Head Teacher / Principal
(Without informing them)

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| **Safeguarding Governor** |
| **Prof. Mark Bailey** |

↓

| **Dukes Chairman** |
| **If Safeguarding Governor not available** |
| **Mr Aatif Hassan** |
| **Direct Line: 0203 696 5300** |
| **Email: aatif.hassan@dukeseducation.com** |

↓

| **LADO** |

Safeguarding & Child Protection Policy

Concerned about the behaviour of the Safeguarding Governor
(Without informing them)

Dukes Chairman
Mr Aatif Hassan
Direct Line: 0203 696 5300
Email: aatif.hassan@dukeseducation.com

LADO
Direct (if Dukes Chairman not available)

In all cases, staff and parents are advised that phone contact will be the first point of communication to report any concerns.

Email communication is only to provide further detail if required and will not be used to believe any concern has been passed on.

If the person is not directly contacted and is unable to be found, then staff / parents will need to make further contact with key personnel on the flow charts or Children's Social Care Team and / or LADO directly.

Aims

The aims of this policy are:

- To ensure that effective safeguarding procedures are in place and are followed by all staff in accordance with national guidance and the locally agreed inter-agency procedures of Wandsworth Safeguarding Children's Partnership (WSCP) for Eaton House Manor Schools and Westminster's Access and Assessment Services team for Eaton House Belgravia.
- To provide a systematic means of monitoring children known or thought to be at risk of harm, as well as support for those children.
- To identify, monitor and support those children who may be in need of Early Help including support from other agencies apart from Children's Services e.g., Child and Adolescent Mental Health Services (CAMHS)
- For all staff to be fully aware and confident of their role in safeguarding and child protection and of their responsibilities to identify and report possible concerns about the welfare of children, including possible harm or abuse
- For all staff to be fully aware of the need to report any concerns about the actions of members of staff, volunteers, visitors or contractors.
- To support children's development in ways that will foster security, confidence, and independence
- To be alert to the risks to young people online and to ensure, through appropriate filtering and monitoring systems, that they are safeguarded in the Eaton House Schools from potentially harmful and inappropriate online material. Also see ICT Acceptable Usage Policy
- To emphasise the need for good levels of communication between all members of staff
- To promote effective working relationships with other agencies
- To ensure that all staff are recruited in accordance with the Schools Recruitment Policy and in accordance with guidance in Keeping Children Safe in Education (September 2024) ("KCSIE") and Disqualification under the Childcare Act 2006 (September 2018)

Eaton House Schools will also create a positive ethos to:

- Establish and maintain an environment where all pupils feel secure, are encouraged to talk and are listened to
- Ensure staff are confident to report any concerns and to deal with any disclosures
- Provide early help to children and their families
- Have methods in place which make it easy for children to report concerns as well as ensuring that all children know they can talk to any adult in Eaton House Schools if they are worried
- Include opportunities in the curriculum for age appropriate personal, social, health and citizenship education (PSHE) and Relationships & Sex Education for pupils to develop the skills they need to recognise and stay safe from abuse, including abuse or exploitation through technology of all kinds

Safeguarding & Child Protection Policy

The Designated Safeguarding Lead

Eaton House Schools have appointed Designated Safeguarding Leads (DSLs) and Deputy Designated Safeguarding Leads (DDSLs), Some are members of the Senior Leadership Team and have the necessary status, training and authority to be responsible for matters relating to the welfare of pupils, including child protection.

In accordance with the Early Years Foundation Stage ("EYFS") statutory framework, the DSL is also responsible for safeguarding in relation to pupils within the EYFS.

Responsibilities of the DSL

The main responsibilities of the DSL are as detailed in KCSIE **Annex C**, but are also detailed below:

- To promote a culture of safeguarding so the welfare and best interests of children is embedded within all the Schools processes and procedures.
- To co-ordinate and monitor safeguarding, being the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies.
- The designated safeguarding lead should take lead responsibility for safeguarding and child protection.
- Immediately upon the receipt of any concerns, to act upon the report.
- To liaise with Wandsworth Safeguarding Children's Partnership (WSCP), for Eaton House Manor Schools, and Westminster's Access and Assessment Services team, for Eaton House Belgravia and other neighbouring Children's Services departments.
- To understand child protection processes, including Section 17 and Section 47 assessments under the Children's Act (1989) and 'Early Help' processes.
- To ensure the safeguarding governor is informed about safeguarding concerns including any referrals.
- To attend case conferences or other multi-agency planning meetings and to contribute to assessments and reports.
- To be responsible for procedures in the Eaton House Schools and to keep detailed, accurate records, including action taken. This includes keeping records for those cases where there is no need to make a referral to any other service.
- To provide a systematic means of monitoring and supporting children known or thought to be at risk of harm or where there are ongoing concerns.
- To promote the educational achievement and care of any children who are looked after. The DSL will take lead responsibility for any looked after children.
- To maintain a regular training programme for all members of the Eaton House Schools staff and volunteers in line with advice from Wandsworth Safeguarding Children's Partnership (WSCP), for Eaton House Manor Schools, and Westminster's Access and Assessment Services team for Eaton House Belgravia.

- To ensure all new staff receive induction training in safeguarding and understand their responsibilities as well as have received a copy of KCSIE Part 1 and / or Annex A.
- To ensure that all staff and governors have confirmed that they have been provided with, read and understood a copy of the Safeguarding and Child Protection Policy (i.e., this document), KCSIE Part 1, Annex A as well as Annex B if they lead or manage or work directly with children have read and understood them.
- To ensure that all staff are assisted to understand and discharge their roles and responsibilities as set out in KCSIE and in this policy.
- To ensure that when children or young people leave the Eaton House Schools that any child protection information is copied for the new educational provider within 5 days and transferred securely and separately from the main file.
- To have an understanding the importance of information sharing, both within the School and with other Schools on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners.
- To ensure that a record of any safeguarding information is obtained from any previous school or nursery for a new pupil joining the schools.
- To monitor the confidentiality, keeping and storage of records in relation to safeguarding. The Eaton House Schools hard copy records on child protection are kept locked in the Head teacher's/Principal's office and are separated from routine pupil records. Access is restricted to the Head Teachers/Principal, DSL, and Deputy DSLs.
- To ensure the Safeguarding Policy is reviewed annually in conjunction with the Head Teachers/Principal, and the Board of Governors/Proprietor, such review to include its effectiveness in practice
- To ensure the Safeguarding Policy is reviewed in the event of an incident or change in legislation, and that any remediation necessary in policy or procedures is given immediate effect
- To be responsible for overseeing online safety in the school with the support of the Eaton House Schools IT manager. The DSL will have responsibility for child protection processes (including online safety and understanding the filtering and monitoring systems and processes in place). *This should be explicit in the role holder's job description*.
- To ensure the Safeguarding Policy is available to parents / carers, published on the Eaton House Schools website.
- To ensure that "Safeguarding" is a standing item on the agenda for, and minutes of, staff meetings. This is to ensure that all members of staff will be aware that there is a safeguarding concern about that child or young person, with detailed information only shared on a 'need to know' basis. It also provides those present with an opportunity to raise any general Schools safeguarding issues.
- To ensure a termly report is sent to the Safeguarding Governor and the annual Safeguarding Audit is presented to the Governing Board.
- Be aware of the requirement so that children investigated by the police whether the police are attending in School or interviewing the child at a police station, that an appropriate adult is present. www.safeguarding.link/pace.

Safeguarding & Child Protection Policy

- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), and
- Be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.

The Deputy DSLs

The Deputy DSLs are trained to the same level as the DSL and in the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of children, ensuring that the DSL receives copies of all reports and referrals and is fully briefed as soon as possible on their return.

The ultimate lead responsibility for safeguarding and child protection rests with the DSL. This responsibility will not be delegated, except under exceptional circumstances such as long-term absence of the DSL.

During term time, the DSL and/or the Deputy DSLs are available during School hours, either on site, or contactable by telephone, for staff, pupils or parents to discuss any safeguarding concerns.

Responsibilities of the Staff

- To provide a safe and supportive learning environment
- To read and understand, Part 1 of Keeping Children Safe in Education and Annex A, as well as Annex B if they lead or manage or work directly with children.
- To read and understand the Schools Safeguarding Policy and Procedures i.e. this document.
- To adhere to the Eaton House Schools Staff Code of Conduct.
- To undertake regular safeguarding training, at least annually.
- To be alert to the signs of abuse and neglect, including child-on-child abuse, and to report any concerns to the DSL immediately.
- To be aware that that even if there are no reports of child-on-child, or any other form of abuse, it does not mean it is not happening, it may just not be being reported.
- To understand the child protection process, including Section 17 and Section 47 assessments under the Children's Act (1989) and 'Early Help' processes.
- To help pupils understand how to keep themselves safe and manage risk.
- To be alert to absenteeism of any children and inform the DSL of any concerns.
- To consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare (Contextual Safeguarding).

Safeguarding & Child Protection Policy

- To report to the Head Teachers/Principal any concerns about the conduct of adults, including low level concerns (this includes behaviour outside Eaton House Schools that might indicate an individual is unsuitable to work with children)

Responsibilities of the Head Teachers/Principal

To promote an overarching culture of safeguarding so the welfare of children is embedded within all the Eaton House Schools processes and procedures operating with the best interests of the child at their heart.

- To have read and understood all parts of Keeping Children Safe in Education thereby ensuring that the Eaton House Schools policy and procedures follow statutory guidance.
- To ensure that KCSIE Part 1 (including Annex A) and the Eaton House Schools Safeguarding Policy are understood and implemented effectively by all staff, whether or not they directly work with children.
- To allocate sufficient time, training and resources to enable the DSL and Deputies to carry out their roles effectively.
- To ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively in accordance with the Eaton House Schools Whistleblowing procedures.
- To ensure pupils are taught about keeping safe, including online
- To ensure systems are in place, which are easily understood and easily accessible for pupils to report concerns, including abuse.
- To deal with any reports regarding concerns or allegations related to the conduct of adults (this includes behaviour outside of school that might indicate an individual is unsuitable to work with children), including low level concerns.
- To seek advice and liaise with the Local Authority Designated Officer (LADO) regarding concerns about adults.
- To undertake training on safer recruitment processes at regular intervals
- To monitor the effectiveness of this policy and its procedures in liaison with the Safeguarding Governor and SLT and to remedy any deficiencies immediately.

Responsibilities of the Board of Governors and Proprietor

- To ensure safeguarding and child protection underpin all relevant aspects of process and policy development, and that processes and policies operate with the best interests of pupils at their heart.
- To ensure policies, procedures and training in the schools are effective and comply with the law at all times.
- To ensure there is a nominated governor for safeguarding, who takes leadership responsibility at Board level for all safeguarding matters.
- To ensure the nominated governor has the required knowledge, skills and expertise to take leadership responsibility for the Eaton House Schools safeguarding arrangements.
- To ensure an appropriate senior member of staff, from the Eaton House Schools leadership team, is appointed to the role of designated safeguarding lead.
- To ensure there is an effective Safeguarding Policy in place, which is consistent with KCSIE, Working together to safeguard children and the requirements of Wandsworth Safeguarding Children's Partnership (WSCP), for Eaton House The Manor Schools and Westminster's Access and Assessment Services team for Eaton House Belgravia.
- To ensure the policy is available publicly on the Schools website.
- To ensure child protection files are maintained, which show a clear chronology and the reason for decisions taken.
- To ensure there are other appropriate policies and procedures in place to safeguard and promote children's welfare including, but not limited to, a Staff Code of Conduct, Anti-bullying Policy, Relationships & Sex Education Policy.
- To ensure that each Dukes organisation has a written behaviour policy and that is it made available to parents through a website or on request. The behaviour policy should take into account the guidance provided below:
  https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1101597/Behaviour_in_schools_guidance_sept_22.pdf
- To ensure there is an effective Staff Code of Conduct (including online conduct) which is implemented throughout the schools.
- To ensure that Eaton House Schools holds at least two emergency contact numbers for each child.
- To ensure that safer recruitment procedures are followed in accordance with Part 3 of KCSIE and that all relevant checks are carried out on all staff before starting their employment and recorded in the Schools Single Central Record (SCR).
- To ensure IT systems have appropriate filters installed without unduly restricting access for educational purposes. As part of this process, the Board of Governors will ensure that Eaton House Schools undertakes regular monitoring of filtering systems in place and regularly reviews their effectiveness. The Board of Governors should ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.

24

- The Governing Body will ensure there are policies and procedures in place regarding pupils accessing the internet in school. The Governing Body will be doing all that it reasonably can to limit children's exposure to the above risks from the Schools IT system. As part of this process, the Governing Body will ensure their school has appropriate filtering and monitoring systems in place and regularly review their effectiveness. The Governing body will consider the number of and age range of their children, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks.

- To have policies and procedures in place relating to the use of cameras and technology within the EYFS.

- A review of the Safeguarding Policy at least annually (and in the case of a serious incident), including an update and review of the effectiveness of procedures and their implementation. The annual review of safeguarding forms part of the summer term Governors' Review Meeting. A termly report is sent to the Safeguarding Governor and the annual Safeguarding Audit is presented to the Governing Board by the DSL or the Head.

- Governing Bodies and proprietors should ensure that ALL governors and proprietors receive appropriate safeguarding and child protection (including online) training at induction. This knowledge should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in our organisation are effective and support the delivery of a robust whole Eaton House Schools approach to safeguarding. Their training should be regularly updated.

- Governing bodies and proprietors should ensure that all staff undergo safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to *filtering and monitoring* – see para 141 for further information) at induction. The training should be regularly updated. Induction and training should be in line with any advice from the safeguarding partners.

- The Proprietor and the Board of Governors will be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their multi-agency safeguarding arrangements.

Governors of independent schools as non-public entities however do not have to follow requirement as laid down in the Public Sector Equality Duty (PSED).

Children with special educational needs and disabilities (SEND)

Staff are made aware that children with special educational needs and/or disabilities as well as other vulnerable groups may be especially at risk of abuse including those with physical health issues. Such children are also more prone to peer group isolation or bullying.

Staff will be aware that:

Safeguarding & Child Protection Policy

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration as it might be due to abuse taking or has taken place.
- Children with SEN and disabilities can be disproportionally impacted by things like bullying - without outwardly showing any signs.
- Communication barriers may exist and difficulties in overcoming these barriers.
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

Any reports of abuse involving children with SEND will require close liaison with the designated safeguarding lead (or deputy) and the SENCO or the named person with oversight for SEND in our schools.

We will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

What to do when there are concerns or if a child makes a disclosure

It is important that children receive the right help at the right time to address risks and prevent issues escalating. It is therefore vital that all staff understand their responsibility to:

- Identify and refer any concerns about a child
- Keep clear written records
- Listen to the views of the child
- Reassess concerns if the child's situation does not improve
- Share information quickly and challenge inaction

Staff see children regularly and know them well, so are in a unique position to observe signs of neglect, abuse, emotional distress, changes in behaviour and/or failure to thrive.

Staff should be aware that younger pupils may also talk about, or demonstrate behaviour, through their play which may give rise to safeguarding concerns.

Concerns may also be raised about a parent/carer's interaction with a pupil or issues such as parental alcohol misuse, domestic abuse, or mental health. If there is any concern at all the incidents must be reported and recorded. In many safeguarding cases it is not one major incident which triggers a referral, but a series of seemingly minor events. It is therefore of the utmost importance that all concerns are recorded and reported to the DSL immediately.

Appendix 1 of this policy give details of some of the types of abuse and safeguarding issues with which staff should be familiar.

Safeguarding & Child Protection Policy

Procedures if staff have a concern about a pupil

- If a member of staff is concerned about a pupil the matter should be referred immediately to the DSL, or the Deputy in the DSLs absence.
- Staff may speak directly to the DSL or Deputy DSL first to discuss their concerns about a pupil or may enter their concern straight on to CPOMS (the Schools management system for safeguarding) for attention by the DSL.
- In either case, reporting a concern must not be delayed and must be reported as soon as possible and no later than the same working day. (also see later section on recording concerns)
- In all instances, a written record must be made by the member of staff on CPOMS, which all staff have access to.
- Any member of staff who cannot access CPOMS for any reason must always contact the DSL directly, and without delay.

Safeguarding & Child Protection Policy

Procedures for staff if a pupil discloses information

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe.

The member of staff should:

- Listen carefully and keep an open mind. Staff should not take a decision as to whether or not abuse has taken place. When the pupil has finished talking, make sure that he/she feels secure and, if appropriate, explain what you are going to do next.
- Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously. A victim will never be given the impression by our staff 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.
- Our staff will explain that the law is in place to protect children and young people rather than criminalise them, and this will be explained in such a way that avoids alarming or distressing them.
- All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and /or they may not recognise their experiences as harmful.

  For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and / or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.
- Do not promise confidentiality. Explain that you have to make sure that the pupil is safe, and you will need to ask other adults to help you to do this.
- Do not cross question the pupil. You must not ask leading questions, that is, a question which suggests its own answer. Let the pupil tell you what he or she wants to and no more. The pupil may be interviewed by a specialist later and too much questioning may prejudice later investigations or cause the child to become anxious and retract his/her information.
- Be prepared to follow up with the pupil, but only in conjunction with advice from the DSL.
- Be aware that younger pupils may disclose issues of a safeguarding nature in general conversation rather than as a specific disclosure to a member of staff.
- Do not attempt any examination or remove a pupil's clothes to look further at an injury. Under no circumstances should photographs be taken of a pupil's injury. It may be possible to observe the pupil during the normal school routine, for example in a physical education (PE) class.
- If a pupil wants to show you his or her injuries, please try and insist that this must wait for a health professional to make an assessment. No child or pupil should be asked to undress to show their injuries to a member of staff.
- Do not attempt to investigate matters further; your role is to listen, record and report your concerns to the DSL.

If a concern or disclosure involves technology or online images staff must follow the specific advice in this policy.

Safeguarding & Child Protection Policy

Mechanisms for pupils to report concerns

The school has a strong pastoral system and promotes an ethos where pupils feel safe to share information about anything that is worrying them.

The School Council provides a 'pupil voice' and encourages pupils to develop the rules and boundaries of acceptable behaviour.

Pupils are encouraged to use the 'worry boxes', tell someone and have emotional check ins during class to share any concerns that they may have. The boxes are checked at least weekly, and well-being lead teachers address these concerns with the children.

There is an annual pupil survey conducted and results carefully considered.

There are posters around school saying who pupils can talk to and children are reminded regularly in assemblies and PSHE lessons on who they can speak to and that we are all here to help.

Support for staff

Eaton House Schools recognises that staff who have become involved with a pupil who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.

Eaton House Schools will support such staff by providing an opportunity to talk through their anxieties with the DSL and will seek further support as appropriate.

The NSPCC helpline is also available if staff have concerns about the way a concern is being handled by the school. Staff can call 0800 028 0285 or email help@nspcc.org

Safeguarding & Child Protection Policy

Recording Safeguarding Concerns

Abuse and neglect are complex issues and are rarely standalone events; therefore, they require a culture of vigilance, professional insight, and respectful challenge, as well as effective recording, reporting and monitoring systems.

- All staff have an appropriate level of access to CPOMS which enables them to record concerns. The DSL and Deputy DSL have full access to enable them to record actions and store all safeguarding records securely.
- All safeguarding concerns must be recorded on CPOMS, the Schools management system for safeguarding.
- If the DSL is not available for any reason the Deputy DSLs must be contacted to deal with the concern initially.
- With regard to any conversations directly with a pupil or overheard, staff must keep a written record of the conversation and concerns arising.
- The record should include the date, time, and place of the conversation, who was present and what was said by the pupil. The record should use names, not initials, for all references to people.
- The record should be specific. Record actual behaviour and language used by a pupil rather than more vague terms such as inappropriate language/behaviour.
- Staff should make the record as soon as possible after speaking to the pupil so the pupil is not alarmed by notes being taken and before the conversation is discussed with anyone else. It is important to record as much as can be remembered, using the pupil's own words.
- The record should contain facts and information only, taking care to avoid personal opinion.
- Notes made of such disclosures or concerns could become part of a statutory assessment by Children's Services and/or part of a criminal investigation so must be completed accurately.
- If more than one member of staff is present when a pupil discloses information or behaves in a manner which gives rise to concerns, each member of staff must make a separate safeguarding report on CPOMS.
- The report must be completed so all the facts known are recorded and so the DSL has a full picture of what has given rise to the concern.
- It is important to record all concerns regarding the welfare of pupils, even those which may appear minor. This is because it is common for minor pieces of evidence to emerge over time and build up a pattern. This type of recording also allows information from various members of staff to be collated.
- Staff must not investigate further or speak to parents or other staff. They must contact the DSL who will then determine the next course of action.

Safeguarding & Child Protection Policy

DSL Action on receipt of a concern about a child

On receipt of the safeguarding report, the DSL must record the decisions made and action taken.

Action will depend on the nature of the concern. It may include one or more

of the following:

- monitoring the pupil in school
- a discussion with parents
- early help intervention from the school and/or another agency
- referral to Children's Services
- referral to the LADO
- report to the police

The member(s) of staff making the report will be informed by the DSL of the action taken.

If the pupil's situation does not appear to be improving, the staff member with concerns should request the DSL to re-consider the action taken.

Preserving evidence

- All evidence (which could include a pupil's work, scribbled notes, iPads, mobile phones containing text messages, computers) must be preserved.
- If evidence is found on an electronic device, the device involved should be confiscated and set to flight mode or, if this is not possible, it should be turned off.
- Staff must not view images, look for further images, copy or print any images or forward images by email or any other electronic means. This is particularly important if images involving 'nudes' or 'semi-nudes' are found, as to do so is a criminal offence.
- If the imagery has already been viewed by accident (e.g., if a pupil has shown it to a member of staff before he/she could ask them not to), this must be reported to the DSL immediately.
- Do not delete the imagery or ask the pupil to delete it.
- Do not ask the pupil(s) involved in the incident to disclose information regarding the imagery.
- Do not share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any pupil(s) involved.
- Do explain that you need to report it and reassure them that they will receive support and help.
- Report the matter to the DSL immediately

Also see DfE Searching Screening and Confiscation Advice for schools and the UKCIS Education Group Sharing nudes and semi-nudes: advice for education settings working with children and young people which outlines how to respond to an incident of nudes and semi-nudes being shared.

Child protection records

- Safeguarding records are kept securely on **CPOMS.**
- Written records are kept of all concerns, whether or not there is a need to refer the matter to Children's Services or another agency.
- There is a clear, detailed chronological summary for each pupil where concerns have been raised and a detail note of any action taken, decisions reached, outcome and how the concerns was followed up.
- If a referral to Children's Services is thought to be required, the DSL will usually contact the local authority for advice prior to notifying parents.
- All discussions with the local authority along with the decisions made and the reasons for those decisions are recorded in writing on **CPOMS.**
- The Wandsworth and Westminster's Social Communication Pathway (SCP) have their own referral forms which must be completed if a formal referral is made by the DSL. A copy of the referral form sent to the local authority must be retained.
- Minutes of any case conferences or discussions with social workers or other professionals involved with the pupil will be stored on **CPOMS**.
- Any new concern or information about a pupil who has active involvement with Children's Services must be passed to the pupil's allocated social worker without delay.
- Any new concern or information about a pupil who has had previous involvement with Children's Services must be passed to Children's Services without delay.
- If a pupil moves to another school, all child protection records are transferred securely, as soon as possible (within 5 days for an in year transfer or within first 5 days of the start of a new term) to the DSL at the new school and a receipt is obtained confirming they have been received.
- Parental permission is not required for records to be shared with the new school.
- On a case-by-case basis the DSL will also consider sharing information proactively with the new school to ensure key staff are aware of the pupil's needs and can have any support in place when the pupil arrives.
- Safeguarding records will be requested from previous schools/nurseries for any new pupils joining the school.

Safeguarding & Child Protection Policy

Information sharing

Information will be shared according to the HM Government guidance Information Sharing (July 2018.)

The governing bodies and the wider School community are aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

The guidance states that practitioners should use their judgement when making decisions on what information to share and the most important consideration should be whether sharing information is likely to safeguard and protect a pupil. Data protection legislation and guidance must not be allowed to stand in the way of sharing information to safeguard pupils.

The guidance states that the information shared should be:

- Necessary and proportionate - Any information shared must be proportionate to the need and level of risk.
- Relevant - Only information that is relevant to the purposes should be shared with those who need it.
- Adequate - Information should be adequate for its purpose. Information should be of the right quality to ensure that it can be understood and relied upon.
- Accurate - Information should be accurate and up to date and should clearly distinguish between fact and opinion. If the information is historical then this should be explained.
- Timely - Information should be shared in a timely fashion to reduce the risk of harm.
- Secure - Wherever possible, information should be shared in an appropriate, secure way.
- Record - Information sharing decisions should be recorded whether or not the decision is taken to share.

Practitioners may share information, without consent when there is a good reason to do so, and the sharing of that information will enhance the safeguarding of that child in a timely manner. It would be legitimate to share information without consent where: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent and if to gain consent would place a child at risk.

Safeguarding & Child Protection Policy

Communication with parents/carers

- All parents are aware from the Schools Parents' Handbook and publication of this policy on the Schools website that the school has a safeguarding policy and is required to follow statutory guidance in respect of reporting to Children's Services any case of suspected abuse.
- From this policy and from notices in the school buildings, parents are made aware of the identities of the DSL and Deputy DSL with whom they may discuss concerns.
- Eaton House Schools will work with parents and outside agencies to help support pupils and their families; however, it will always put the duty of care to the child as its priority and will refer concerns if it considers a pupil is or may be at risk of harm or has suffered harm.
- The DSL will normally request a meeting with the parents of the pupil about whom there are concerns to discuss the matter. He/she will explain the reasons for the Schools concerns and the course of action the school intends to take.
- Referrals to Children's Services or the LADO (or initial advice from either service) do not require prior parental consent. The DSL must act in in the best interests of the pupil, even if this results in making a referral against the parents' wishes.
- If the DSL believes that notifying parents might in any way exacerbate the problem, increase the risk to the pupil or if there are any other extenuating circumstances, initial advice will be sought from Children's Services prior to notifying the parents. This may result in an immediate referral to Children's Services without parents being notified.
- If there is an allegation which involves a member of staff, parents will only be informed after the school has consulted with the LADO and has obtained the LADO's consent.
- If a parent has any safeguarding concerns, he/she should contact the Schools DSL as soon as possible.

Referrals to Children's Services and/or other agencies

Referrals about an individual pupil must be made to the borough in which the pupil resides. However, advice may always be obtained from the Children's Services department of the Schools local authority, regardless of the where the pupil resides.

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care (and if appropriate the police) is made immediately. Referrals should follow the local referral process.

The DSL follows the Levels of Need thresholds from Wandsworth Safeguarding Children's Partnership (WSCP) for Eaton House Manor Schools, and Westminster's Access and Assessment Services team for Eaton House Belgravia when decisions are made about making referrals.

Available here:

Safeguarding & Child Protection Policy

Wandsworth: Levels of Need Framework 2023 (wscp.org.uk)

(Neighbouring London authorities also use these London wide thresholds, should a pupil not reside within Wandsworth.)

There are 4 levels.

1. No referral required
2. Child in need of Early Help (Early Help Assessment)
3. Child in need of targeted or specialist support (Referral to MASH)
4. Child at risk of significant harm (Urgent referral to MASH)

The schools will ensure as a relevant agency that it should be part of discussions with statutory safeguarding partners to agree the levels for the different types of assessment and services to be commissioned and delivered, as a part of "local arrangements".

Our DSL / DDSLs will be familiar with Wandsworth Council's local threshold document and Chelsea and Westminster Council's local threshold document.

Early Help

Early help is support for children of all ages that improves resilience and outcomes or reduces the chance of a problem getting worse. Early help may be appropriate for children who have several needs, or whose circumstances might make them more vulnerable.

Additional support systems in school may form part of early help strategies e.g. additional pastoral support, school mentors, support from a counsellor and should feed into Local Authority early help measures as required.

Evidence is kept of all early help interventions.

Any pupil may benefit from early help, but KCSIE recommends that all staff should be particularly alert to the potential need for early help for a pupil who:

- Is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited

Safeguarding & Child Protection Policy

- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

Form teachers through PSHE and form periods ensure that pupils are aware that staff are available to listen and provide additional in-school support if necessary.

Eaton House Schools also has access to other counselling and support services if needed.

Wandsworth Council (and other London boroughs) Threshold Levels 3 and 4

- Pupils who meet the threshold of Level 3 or Level 4 will be referred to MASH immediately by the DSL.
- If there is ever any doubt about whether a referral should be made advice will be sought from the Wandsworth and Westminster Safeguarding Advisors or from the MASH team.
- The DSL may also take initial advice and discuss matters with other services such as the Education Welfare Officer, CAMHS or the police. Under no circumstances will the situation be left beyond the day that the concern is first raised.
- If a referral is made or advice is obtained from Children's Services, the safeguarding governor will be informed of the case by the DSL as soon as possible.
- All telephone conversations with Children's Services, the LADO or other local authority officers are recorded by the DSL on CPOMS.
- The DSL will discuss the concerns with the pupil's parents/carers at the earliest appropriate opportunity.
- The DSL will assist other agencies to make enquiries into concerns about a pupil's welfare. This will include ensuring that the school is represented at multi-agency meetings, including child protection conferences, and that reports/information about the pupil are provided as required.
- In cases of extreme emergency or if a serious criminal offence appears to have been committed **the police will be contacted immediately.**
- The referral process outlined is also followed when there are concerns about a pupil who may be at risk of radicalisation. The level of risk will identify the most appropriate referral, which could include Children's Services and/or **Channel.**

(Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.)

Safeguarding & Child Protection Policy

The policy of the school requires that all referrals are made by the Schools DSL; however, **anybody can make a referral** and in exceptional circumstances staff may raise concerns directly with Children's Services.

If, at any point, there is a risk of immediate serious harm to a pupil a referral should be made to Children's Services or the police on 999 immediately.

Safer recruitment

The school follows statutory guidance for the safer recruitment and employment of staff who work with children as set out in Part Three of KCSIE and Disqualification under the Childcare Act 2006 (September 2018). Please also see our *Selection, recruitment and Disclosure Policy*.

All staff are checked as to their suitability. These checks include

- The taking up of references
- Verification of identity
- Verification of right to work in the UK
- Where appropriate, verification of qualifications
- Where appropriate, overseas police checks
- (A satisfactory enhanced check with the Disclosure & Barring Service (DBS), including a Barred List check for staff engaged in regulated activity
- A self-declaration to ensure compliance with disqualification regulations made under the Childcare Act 2006
- For teachers, verification of Qualified Teacher Status (QTS), and the completion of teacher induction or probation.
- For staff engaged in teaching duties, a check that the teacher is not subject to a prohibition order issued by the Secretary of State.
- Where appropriate, a check that there is no teacher prohibition order issued by any overseas professional authority
- Where appropriate, an overseas criminal record check(s)
- Where appropriate, a check to ensure the person is not barred from taking part in the management of an independent school
- A medical fitness questionnaire and / or medical self-declaration.

Staff involved in recruitment receive appropriate training in safer recruitment and this is updated no less than every five years.

In addition, as part of the shortlisting process our schools **will carry out** an **online search** as part of their due diligence on any shortlisted candidates.

This may help identify any incidents or issues that have happened, and are publicly available online, which the schools might want to explore with the applicant at interview.

Safeguarding & Child Protection Policy

Our human resources department will make known of this due diligence by placing this intention to research publicly available online material within the advert, candidate pack and application from so that it is well known before any short-listing takes place that this will occur.

Visiting Speakers

Visiting speakers are always vetted and staff must obtain permission from the Head Teachers/Principal for any speakers to visit the schools.

On arrival, photographic evidence will be asked to check their identification and they will be asked to sign in the signing in book in reception. As they will be always supervised, a DBS or barred list check will not be required, unless it is deemed, they may be undertaking regulated activity.

Information on any online research undertaken, references received (written or verbal on their suitability) etc must be collated in the Eaton House Schools visitor log which must be a separate document from the signing in book at reception.

This log will contain date of visit, company name, person's name, purpose of visit, visit approved by and risk assessment checked if activity being undertaken requires a review.

Staff Induction

The DSL is responsible for ensuring that all new members of staff working in the schools, and any volunteers, receive training on their responsibilities for safeguarding and child protection and on the procedures for recording and referring any concerns. This training will take place prior to the new member of staff starting work with the children.

All newly recruited staff are provided with the following information and given in-house training on safeguarding issues as part of their induction. This includes:

- Keeping Children Safe in Education, Part 1 and Annex A. (and Annex B if they work directly with children)
- Safeguarding Policy
- Staff Code of Conduct
- ICT Acceptable Usage Policy.
- Sharing of Concerns (Whistleblowing) Policy
- Pupil Behaviour, Discipline and Exclusions Policy
- Anti-bullying Policy
- Prevent training
- Procedures on managing children who go missing from education (in Attendance Policy)
- How to report concerns through CPOMS

Eaton House Schools takes a risk-based approach to the level of information provided when training other temporary staff, staff running clubs, contractors and volunteers.

Safeguarding & Child Protection Policy

Staff Training

- All staff are required to read, at least annually, the Safeguarding Policy (i.e this policy) and the Staff Code of Conduct and must confirm that they have done so.
- All staff are required to read and understood the guidance for staff in Part 1 and **Annex A** of KCSIE and confirm that they have done so. **Annexe A** is a condensed version of Part one of Keeping children safe in education. It can be provided (**instead of Part one**) to those staff who **do not directly work with children**, if the governing body or proprietor think it will provide a better basis for those staff to promote the welfare of and safeguard children.
- Every member of staff receives comprehensive level 2 training in safeguarding (including on-line safety) at least every three years, in line with advice from the local SCP. Refresher training is provided annually at the start of the academic year and on specific issues through the year as required.
- Staff will also receive regular informal updates on safeguarding and child protection (including online safety) / related issues as and when required through bulletins, INSET training and staff meeting announcements from the DSL or if local circumstances warrant. This could also include updates via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.
- All staff are trained in how to listen, respond to and report any disclosures including those which involve **child-on-child** sexual violence or sexual harassment.
- All staff will have training on child protection (including online safety, which amongst other things includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. This training should be regularly updated and will ensure that staff understand the current IT provision in place, manage them effectively and know how to escalate concerns when identified.
- Induction training for staff will be in line with any advice from the organisations safeguarding partners.

Safeguarding & Child Protection Policy

DSL and DDSLs Training

The DSL and Deputy DSL undergo level 3 training at a minimum every two years, which includes training in inter-agency working in line with **Annex C** of KCSIE. They have updates, at least annually, on specific issues as required.

Governor Training

The Board of Governors will ensure that **ALL** governors and proprietors receive appropriate safeguarding and child protection (including online) training at induction.

This knowledge should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in our organisation are effective and support the delivery of a robust whole Eaton House Schools approach to safeguarding. Their training will be regularly updated.

The governor responsible for safeguarding has received safeguarding training specifically for governors and undertakes refresher training **every two years, as a minimum**.

Acceptable Use of technology – (including in the EYFS)

(Also see ICT Acceptable Usage Policy)

- Staff must not take video footage or photographs of pupils except for Eaton House Schools purposes.
- Any such images must not be placed in the public domain without the permission of the Head Teachers/Principal.
- Eaton House Schools devices should be used wherever possible
- If a personal device is used, photographs or videos of pupils must not be stored or retained on personal cameras, mobile phones, or other devices. Any images must be uploaded to the Eaton House Schools server as soon as possible and permanently deleted from the personal device.
- Permitted images are stored securely on a password-protected section of the school intranet. They are deleted when no longer required.
- Cameras, mobile phones, or other photographic devices are not allowed in any areas where pupils may be washing or changing, nor should photography be used in a manner that may offend or cause upset.
- Parents / carers are asked to restrict photography whether on cameras, mobile phones, or other devices to major school events published in the school calendar only. General filming in the Eaton House Schools by parents / carers is never permitted.

Safeguarding & Child Protection Policy

- Parents / carers should be aware that other parents in the Eaton House Schools may object to photographs being taken which, inadvertently or otherwise, include their child; therefore, any images taken must be for personal use only and should not be shared on social media.
- Other visitors, volunteers and contractors in Eaton House Schools are not permitted to take photographs in any area of the school without specific permission from the Head.
- The general use of mobile telephones in all areas of Eaton House Schools (calls, texting and email) by parents is not permitted.
- Staff may only communicate with pupils through Eaton House Schools email system and the designated apps used by older pupils for homework.
- Staff must not use their mobile phones or other personal devises for calls or messaging when engaged with pupils and all devices must be out of sight.

Filtering and Monitoring Systems

The appropriateness of any filtering and monitoring systems are a matter for individual schools and colleges and will be informed in part, by the risk assessment required by the Prevent Duty.

https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty

The appropriateness of any filtering and monitoring systems are a matter for individual schools and colleges and will be informed in part, by the risk assessment required by the Prevent Duty.

To support schools and colleges to meet this duty, the Department for Education has published filtering and monitoring standards which set out that schools and colleges should:

- Identify and assign roles and responsibilities to manage filtering and monitoring systems.
- Review filtering and monitoring provision at least annually.
- Block harmful and inappropriate content without unreasonably impacting teaching and learning.
- Have effective monitoring strategies in place that meet their safeguarding needs Governing bodies and proprietors should review the standards and discuss with IT staff and service providers what more needs to be done to support schools and colleges in meeting this standard.

Information security and access management

Our organisation is directly responsible for ensuring we have the appropriate level of security protection procedures in place in order to safeguard our systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

We take into account the guidance on e-security is from the National Education Network.

Where possible, we will consider meeting the Cyber security standards for schools and colleges.GOV.UK.

Safeguarding & Child Protection Policy

Broader guidance on cyber security including considerations for governors and trustees can be found at Cyber security training for school staff:

https://NCSC.GOV.UK

https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/cyber-security-standards-for-schools-and-colleges

Online Safety

Online safety policy

Our approach to online safety is reflected in this safeguarding policy, which includes appropriate filtering and monitoring on school devices and school networks.

Considering the 4Cs (below) provides the basis of an effective online policy for our organisation which covers:

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.

contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and

commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If we feel our pupils, students or staff are at risk, then we will seek advice from the Anti-Phishing Working Group which can be found at: https://apwg.org/

Our organisation has a clear policy on the use of mobile and smart technology, which will also reflect the fact many children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G). This access means some children, whilst at school may sexually harass, bully, and control others via their mobile and smart technology, share indecent images consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content.

Our organisation does carefully consider how this is managed on our premises and have reflected this in our Staff Mobile Telephone Usage Policy and our Pupil Telephone Usage Policy and this safeguarding policy.

Safeguarding & Child Protection Policy

Staff Code of Conduct

The Staff Code of Conduct gives comprehensive, clear guidance on the expected behaviour of **all adults** in the school. Staff should always maintain appropriate professional boundaries, avoid behaviour which could be misinterpreted by pupils or others and report any conduct by an adult which raises concern. Failure to follow the Staff Code of Conduct is likely to result in disciplinary action being taken.

Please refer to the separate Staff Behaviour Safeguarding (Code of Conduct) Policy.

Safeguarding & Child Protection Policy

Whistleblowing

It is recognised that pupils cannot be expected to raise concerns in an environment where staff fail to do so. All staff should be aware of their duty to raise concerns, which may include the attitude or actions of colleagues. All members of the school community have a duty to protect children and should they have concerns must make these concerns known to the Head Teachers/Principal.

Please also see our Sharing Concerns (Whistleblowing) Policy as well as advice on low-level concerns.

Allegations against staff

As part of its overall safeguarding ethos, the school ensures that it promotes an open and transparent culture in which staff feel confident to report all concerns about adults working in Eaton House Schools (including self-employed staff, supply teachers, volunteers and contractors).

All members of staff must follow the Staff Code of Conduct and conduct themselves in a professional manner at all times, both to ensure the safety of the pupils, and to reduce the risk of any allegation of improper behaviour.

If any allegation of abuse or suspected abuse is made against a member of staff or volunteer, Eaton House Schools will follow the guidance in Part 4 of KCSIE and the procedures of Wandsworth Safeguarding Children's Partnership (WSCP), for Eaton House Manor Schools, and Westminster's Access and Assessment Services team for Eaton House Belgravia.

Allegations that might indicate that a person is unsuitable to work with children are where a person has:

- Behaved in a way that has harmed a child or may have harmed a child and/or:
- Possibly committed a criminal offence against or related to a child and/or:
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or:
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The following procedures relate to all members of all staff, (including the self-employed, supply staff and contractors) governors and volunteers or any other adults who are currently working in the schools, regardless of whether the schools, is where the abuse is alleged to have taken place and regardless of whether it involves pupils at these schools.

Please note that all other concerns about members of staff should be reported through the organisation's Sharing of Concerns (Whistleblowing) Policy and Low-Level Concerns Policy.

If in any doubt, please speak with the Head Teachers/Principal in the first instance.

Safeguarding & Child Protection Policy

Reporting an allegation or concern

- Staff must never think that abuse by an adult is not possible in these schools, or immediately disbelieve an accusation against someone who is known well and trusted.
- A member of staff receiving an allegation of abuse by another member of staff, or with concerns about another member of staff, should report this immediately to the Head Teachers/Principal, unless the Head Teachers/Principal, is the one against whom the allegation is made.
- An allegation against the Head Teachers/Principal, should be reported to the Safeguarding Governor, without notifying the Head Teachers/Principal, first.
- In the absence of Head Teachers/Principal, an allegation against a member of staff must be reported to the Safeguarding Governor and in their absence the **Chairman of Dukes Education, Mr Aatif Hassan.**
- In any instance where there may be a conflict of interest about reporting an allegation or concern to the Head Teachers/Principal, or to the Safeguarding Governor, the **Chairman of Dukes Education – Mr Aatif Hassan** should be **contacted directly** and without hesitation. He will then contact the LADO immediately for further advice.
- Concerns may be reported verbally, directly to the relevant senior member of staff, or by email. Any staff who make a report verbally in the first instance will also be required to make a written record of the information they have disclosed.

Procedures & Informing the Local Authority Designated Officer (LADO)

- If the allegation constitutes a possible serious criminal offence, or in the case of serious harm, or if a pupil is in immediate danger, a referral to Children's Services and/or the police **MUST** be made immediately.
- An allegation of abuse by an adult will always result in a senior person from the school (as detailed above) contacting the LADO of Wandsworth Safeguarding Children's Partnership (WSCP), for Eaton House Manor Schools, and Westminster's Access and Assessment Services team for Eaton House Belgravia, who will advise on the next steps to be taken.
- Under no circumstances will Eaton House Schools conduct an investigation without first informing the LADO and seeking advice about the course of action to be taken.
- Borderline cases will also be discussed and, following discussions, the LADO will advise what further steps should be taken.
- There are two aspects to consider when an allegation is made: -
- Look after the **welfare of the child** - the DSL is responsible for ensuring that the child is not at risk and for referring cases of suspected abuse to Children's Social Care as described earlier.
- Investigate and support the person subject to the allegation - the case manager (usually the Head Teachers/Principal, unless the Head Teachers/Principal, is the subject of the allegation)

Safeguarding & Child Protection Policy

should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

- Eaton House Schools aim will be to achieve a quick resolution of the 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.

- The Head Teachers/Principal will obtain written details of the allegation, signed and dated, from the person who received the allegation or the person who is making the allegation. If a pupil has made an allegation, a written note of what the pupil has said will be made by the member of staff to whom the pupil made the allegation.

- The Head Teachers/Principal will also record any basic information to establish the facts, including dates, times, locations and names of potential witnesses and any CCTV footage.

- Any allegation against employed staff or volunteers, including those considered borderline, must be reported and discussed with the LADO without delay, and **within one working day**.

- An initial assessment of any allegation referred will be made by the LADO and the Head Teachers/Principal. They will judge whether there is a need for immediate action, whether the allegation is demonstrably false or whether there has been inappropriate behaviour or poor practice that can be dealt with through the Eaton House Schools usual staff disciplinary or low-level concerns procedures.

- Where the initial discussion leads to no further action, the case manager and the LADO should:
- record the decision and justification for it; and
- agree on what information should be put in writing to the individual concerned and by whom.

- Where further enquiries are required the LADO and case manager will discuss how and by whom the investigation will be undertaken. In straightforward cases, the investigation will normally be undertaken by the Head Teachers/Principal.

- If the nature or complexity of the allegation requires it, the allegation may require an independent investigator.

- In the case of a referral and investigation, the Head Teachers/Principal must ensure, before contacting any interested parties, that there is no objection by the investigating agencies.

- Where there are no objections from the investigating agencies, the Head Teachers/Principal will:
- inform the person making the allegation and explain the likely course of action
- ensure the parents of the pupil(s) who is the alleged victim have been informed about the allegation and the likely course of action
- inform the member of staff against whom the allegation is made and explain the likely course of action
- keep a written record of the above.

- The Head Teachers/Principal, in consultation with the LADO, will make the decision whether or not to suspend the teacher / member of staff involved.

- If an allegation is made, every effort will be made to maintain confidentiality and guard against unwanted publicity while the allegation is being investigated. *The Education Act (2011)* prevents the 'publication' of material by any person that may lead to the identification of a teacher who is the subject of an allegation. Parents and carers will also be made aware of the prohibition on reporting or publishing allegations about teachers.

- The Head Teachers/Principal, will take advice from the LADO, the Safeguarding Governor and other agencies to agree:
- Who needs to know and exactly what information can/cannot be shared
- How to manage speculation and gossip
- What, if any, information can be given to the wider community to reduce speculation
- If necessary, how to manage the press.
- The school has a duty of care towards its employees and will ensure that effective support is provided for anyone facing an allegation. The individual concerned will be advised to contact their trade union representative, if they have one, or a colleague for support.
- The following definitions will be used when determining the outcome of allegation investigations:
- Substantiated: there is sufficient evidence to prove the allegation.
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.
- False: there is sufficient evidence to disprove the allegation.
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.
- Allegations that are found to have been malicious will be removed from personnel records and any that are not substantiated, are unfounded or are malicious will not be referred to in employer references.
- Records concerning allegations of abuse must be preserved until the accused has reached normal pension age or for 10 years from the date of the allegation if longer.
- Both the DSL and Head Teacher will ensure that all staff should expect to support social workers and other agencies following any referral.

Allegations relating to supply teachers/employees of third party

Eaton House Schools procedures for managing allegations against staff above also apply to staff not directly employed by the schools, for example, supply teachers provided by an employment agency or business ('the agency'). Eaton House Schools will usually take the lead, but agencies/ third party employers will be notified and should co-operate in any enquiries from the LADO, police and/or Children's Services.

In no circumstances will Eaton House Schools decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome.

The Eaton House Schools will discuss with the agency whether it is appropriate to suspend the supply teacher an investigation is carried out but this decision rests with the Head Teachers/Principal, and the LADO.

Safeguarding & Child Protection Policy

Referral to the Disclosure & Barring Service (DBS) and Teaching Regulation Agency (TRA)

If the Eaton House Schools ceases to use the services of any person (whether employed, contracted, a volunteer or a student) because that person was considered unsuitable to work with children, a prompt and detailed report will be made to the DBS.

This will also include anyone who would have been dismissed if they had not resigned first.

For teaching staff, the school also has a legal responsibility to report the matter to the to the Teaching Regulation Agency (TRA) which may result in a prohibition order being issued by the Secretary of State for Education, as required by sections 141D and 141E of the Education Act 2002.

A report to the TRA may also be made for additional reasons 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'.

Advice about whether an allegation against a teacher is sufficiently serious to refer to the TRA can be found in misconduct: the prohibition of teachers (October 2015). Further guidance is published on the TRA website - https://teacherservices.education.gov.uk/

Low-level Concerns

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work, and does not appear to meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

A member of staff may have doubts about the behaviour of another adult towards a pupil, or another child, or concerns about how their own behaviour might be interpreted.

- Examples of such behaviour could include, but are not limited to:
    - being over friendly with children
    - having favourites
    - taking photographs of children on their mobile phone/other device
    - engaging with a child on a 1:1 basis in a secluded area or behind a closed door
    - using inappropriate sexualised, intimidating, or offensive language,
- Email, messaging, use of social media sites or other communication between adults and pupils outside agreed protocols

Safeguarding & Child Protection Policy

- Any incident where he/she feels that his/her actions or behaviour towards a pupil or that of another adult, may have been misinterpreted or may have given rise to a risk or misinterpretation.
- Staff must report any low-level concerns whatsoever to the Head Teachers/Principal or Safeguarding Governor.
- The Head Teachers/Principal will be the ultimate decision maker in respect of all low-level concerns. The Head Teachers/Principal may wish to consult with the DSL and take a more collaborative decision-making approach if the need arises.
- Staff are also encouraged, and to feel confident if the need arises, for them to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.
- When a low-level concern has been raised by a third party, the Head Teachers/Principal will collect as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses. The name of the person making the report will be noted and requests to remain anonymous will be respected as far as reasonably possible.
- The school will also consider if any wider issues in the school enabled the behaviour to occur or contributed to it, and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence.
- All low-level concerns will be recorded in writing. The record will include:
  - o   details of the concern.
  - o   the context in which it arose.
  - o   evidence collected by the Head Teachers/Principal where the concern has been raised via a third party.
  - o   the decision categorising the type of behaviour.
  - o   action taken.
  - o   the rationale for decisions and action taken.
  - o   the name of the individual sharing the concerns (respecting any wish to remain anonymous as far as possible)
- Records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)
- Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it will be referred to the LADO.
- The purpose of low-level reporting is to protect both pupils and the staff working with them and allows a system for a simple record to be kept in case events are later referred to or any patterns emerge.
- Low-level concerns relating to supply staff and staff employed by a third party will be reported to the agency/employer in order that any patterns of behaviour may be identified.

Safeguarding & Child Protection Policy

- m)A staff member who reports a low-level concern, or a more serious allegation, in good faith will suffer no detriment as a result and will benefit from the protection set out in the Eaton House Schools Sharing of Concerns (Whistleblowing) Policy.
- If there is any doubt as to whether a low-level concern meets the harms threshold, then the Head Teachers/Principal will consult with the LADO.

Non-recent / Historical allegations

Abuse can be reported no matter how long ago it happened.

Where an adult makes an allegation to the school that they were abused as a child, the individual will be advised to report the allegation to the police.

Non-recent / historical allegations made by a child, will be reported to the LADO in line with Wandsworth Safeguarding Children's Partnership (WSCP), for Eaton House Manor Schools, and Westminster's Access and Assessment Services team, for Eaton House Belgravia**,** procedures for dealing with non-recent allegations. The LADO will coordinate with Children's Services and the police.

Board of Governors and Proprietorial Oversight

Termly reports are sent to the Board of Governors where we discuss all safeguarding issues, and they will review the data breakdown logged on Eaton House Schools CPOMS system for each term.

In addition, the Head Teachers/Principal speaks to the safeguarding governor about any concerns.

Should the school need to make a referral the governors will be immediately informed.

The SCR is checked by the safeguarding lead at Dukes Education as well as periodically by the Safeguarding Governor and DSL.

Use of school premises by external organisations

Our Board of Governors will ensure that when our schools hire or rent out our facilities to organisations or individuals (for example to community groups, sports associations, and/or service providers to run community or extra-curricular activities) that appropriate arrangements will be in place to keep children safe as per the DfE guidance After-school clubs, community activities and tuition: safeguarding guidance for providers

If these services or activities are under direct supervision or management of our staff, the Schools arrangements for *child protection will apply*.

Safeguarding & Child Protection Policy

Where services or activities are provided separately by another body our Board of Governors will seek assurance that the external organisation or person concerned has appropriate safeguarding and child protection policies and procedures in place. The external organisation will also agree to inspection of these arrangements and associated documentation when required.

This applies regardless of whether or not the children who attend any of these services or activities are children on the Schools roll.

Our organisation may receive an allegation relating to an incident that happened when an individual or organisation was using our school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities).

As with any safeguarding allegation, our organisation will follow our safeguarding policies and procedures, including informing the LADO.

The Board of Governors will also ensure safeguarding requirements are included in any service level agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

Keeping Children Safe outside of our Organisation

When services or activities are provided separately by another body, The governing body will seek assurances that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place for the provider to liaise with the school or college on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll or attend the college.

The governing body will also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of our premises; and that failure to comply with this would lead to termination of the agreement.

The guidance on Keeping children safe in out-of-school settings details the safeguarding arrangements that our organisations should expect these providers to have in place is as below:

https://www.gov.uk/government/publications/alternative-provision

Safeguarding & Child Protection Policy

Other documents informing the policy

1. Safer Recruitment Consortium 'Guidance for safe working practice for those working with children and young people in education settings'

https://saferrecruitmentconsortium.org/

2. DfE guidance 'Teaching online safety in school'

https://www.gov.uk/government/publications/teaching-online-safety-in-schools

3. Mental health and behaviour in schools: departmental advice

https://www.gov.uk/guidance/mental-health-and-wellbeing-support-in-schools-and-colleges

4. *When to call the police*, non-statutory guidance from the National Police Chiefs' Council

https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20police%20guidance%20for%20schools%20and%20colleges.pdf

5. DfE advice 'Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers

https://assets.publishing.service.gov.uk/media/66320b06c084007696fca731/Info_sharing_advice_content_May_2024.pdf

7. DfE Searching Screening and Confiscation Advice for schools

https://www.gov.uk/government/publications/searching-screening-and-confiscation

8. UKCIS Education Group: Sharing nudes and semi-nudes: advice for education settings working with children and young people

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

9. Designated teacher for looked after children

https://www.gov.uk/government/publications/designated-teacher-for-looked-after-children

10. Counselling in schools: *a blueprint for the future*

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/497825/Counselling_in_schools.pdf

11. UK Council for Internet Safety (UKCIS) guidance: *Education for a connected World*

https://www.gov.uk/government/publications/education-for-a-connected-world

12. The UKCIS **external visitors' guidance** will help schools and colleges to ensure the

Safeguarding & Child Protection Policy

maximum impact of any online safety sessions delivered by external visitors

https://www.gov.uk/government/publications/using-external-visitors-to-support-online-safety-education-guidance-for-educational-settings

13. National Crime Agency's CEOP education programme: Thinkuknow

https://www.ceopeducation.co.uk/

14. Public Health England: *Every Mind Matters*

https://www.gov.uk/government/news/public-health-england-launches-new-every-mind-matters-campaign

15. Harmful online challenges and online hoaxes - this includes advice on preparing

for any online challenges and hoaxes, sharing information with parents and carers

and where to get help and support.

https://www.gov.uk/government/publications/harmful-online-challenges-and-online-hoaxes

16. London Grid for Learning – undressed guidance,

Undressed (lgfl.net)

17. Force Marriage Unit resources

https://www.gov.uk/guidance/forced-marriage

18. Forced Marriage – The Right to Choose

https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage

19. County Lines – disruption toolkit

https://www.gov.uk/government/publications/child-exploitation-disruption-toolkit

20. Operation Encompass

The helpline is available 8AM to 1PM, Monday to Friday on **0204 513 9990** (charged at local rate).

Home : Operation Encompass

Safeguarding & Child Protection Policy

Appendix1: Categories of abuse and specific Safeguarding issues

Abuse, neglect and exploitation

Eaton House Schools staff are aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another. Therefore, staff should always be vigilant and always raise any concerns with the DSL or DDSL.

Some staff may feel that the content of this appendix does not apply to them due to the age-range and nature of activity described.

However, all staff must be prepared to act on disclosures from any child or parent / carer which may be occurring or witnessed outside of their organisation.

Adults or young people from within or outside of their organisation may also commit inappropriate acts which are or can cause risk of harm to young people. Therefore, information in this section is deemed relevant to be read and understood by all.

It is therefore essential that all staff are familiar with the rest of the information contained in this policy and assume it would never occur in their establishment and if any doubt refer anything reported to the DSL in the first instance.

KCSIE 2024 provides an updated definition of abuse as:

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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse including where they see, hear or experiences its effects. 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. Children may be abused by an adult or adults or by another child or children.

The DSL will ensure that all staff are aware of the signs of abuse. The following information on signs of abuse is intended as a guide only; signs listed in one category may apply equally to another, as behaviours can be very interlinked.

Any concerns, whether they are listed below or not, should be brought to the attention of the DSL immediately. The following signs are not conclusive evidence but may be a warning, particularly if a pupil exhibits several signs or a pattern emerges. It is important to remember that there may also be explanations, other than abuse, for a pupil showing such signs.

Categories of Abuse

The main categories of abuse outlined in KCSIE, are

Safeguarding & Child Protection Policy

- Physical abuse
- Emotional abuse (including domestic abuse)
- Sexual abuse
- Neglect

Risk factors

In an abusive relationship the child may

- appear frightened or wary of the parent/s or other adult
- act in a way that is inappropriate to her/his age and development, although full account needs to be taken of different patterns of development and different ethnic groups.
- The parent or carer may
  - persistently avoid child health promotion services and treatment of the child's episodic illnesses
  - have unrealistic expectations of the child
  - frequently complain about/to the child and may fail to provide attention or praise (high criticism/low warmth environment)
  - be absent or misusing substances
  - persistently refuse to allow access on home visits
  - be involved in domestic violence.

Staff should be alert to changes in a pupil's behaviour if there is a new carer (e.g., nanny or au pair) in the pupil's home.

Recognising signs of physical abuse

Physical abuse 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.

The following are often regarded as indicators of concern:

- an explanation which is inconsistent with an injury
- several different explanations provided for an injury
- unexplained delay in seeking treatment
- the parents/carers are uninterested or undisturbed by an accident or injury
- parents are absent without good reason when their child is presented for treatment
- repeated presentation of minor injuries (which may represent a "cry for help" and if ignored could lead to a more serious injury)
- family use of different doctors and A&E departments
- reluctance to give information or mention previous injuries
- two simultaneous bruised eyes, without bruising to the forehead (rarely accidental, though a single bruised eye can be accidental or abusive)

- repeated or multiple bruising on the Head or on parts of the body unlikely to be injured accidentally
- variation in colour, possibly indicating injuries caused at different times
- the outline of an object used, e.g., marks from a belt or a hairbrush, or of a handprint
- bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- bruising around the face
- grasp marks on small children
- bruising on the arms, buttocks and thighs may be an indicator of sexual abuse
- bite marks
- circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- scalds that have a line indicating immersion or poured liquid (a child getting into hot water of his/her own accord will struggle to get out and cause splash marks)
- scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath
- medical attention is sought after a period of delay when a fracture has caused symptoms such as swelling, pain or loss of movement.

Recognising signs of emotional abuse

Another form of abuse is 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 he or she is worthless or unloved, inadequate, or valued only insofar as meeting the needs of another person. It may include not giving the child opportunities to express his or her views, deliberately silencing the child or 'making fun' of what he or she says or how the child communicates. It may feature age or developmentally inappropriate expectations being imposed on the 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, including domestic violence.

It may involve serious bullying (including cyberbullying), causing the child frequently to feel frightened or in danger, or the exploitation or corruption of the child. Some level of emotional

abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse may also indicate the presence of other forms of abuse.

The following may be indicators of emotional abuse:

- developmental delay
- abnormal attachment between a child and parent/carer, e.g.,
- excessive anxiety on the part of either
- indiscriminate attachment or failure to attach

- aggressive behaviour towards others
- scape-goateed within the family
- frozen watchfulness, particularly in pre-school children
- low self-esteem and lack of confidence
- withdrawn or seen as a "loner" – difficulty relating to others
- reverting to younger behaviour
- depression, withdrawal
- fear of academic failure or 'getting things wrong'.

For further information on bullying, including cyber bullying, please see Eaton House Schools Anti-bullying Policy.

Recognising signs of sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching the outside of clothing.

They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse 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.

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about, and full account should be taken of the cultural sensitivities of any individual child/family.

Recognition can be difficult, unless the child makes a disclosure. There may be no physical signs and indications are more likely to be emotional/behavioural.

Some behavioural indicators associated with this form of abuse are

- inappropriate sexualised conduct
- sexually explicit behaviour, play or conversation, inappropriate to
- the pupil's age
- continual and inappropriate or excessive masturbation
- self-harm (including eating disorders), self-mutilation and suicide attempts
- involvement in prostitution or indiscriminate choice of sexual partners
- an anxious unwillingness to remove clothes, e.g. for sports events (but this may be related to cultural norms or physical difficulties).
- Some physical indicators associated with this form of abuse are:

- pain or itching of genital area
- blood on underclothes
- pregnancy in a younger girl where the identity of the father is not disclosed
- physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing.

Staff should also be aware of the possibility of sexual exploitation.

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and

May cause developmental damage. A useful umbrella term is "*harmful sexual behaviour* (*HSB).* The term has been widely adopted in child protection and is used in this advice.

HSB can occur online and/or face-to-face and can also occur simultaneously between the two. HSB should be considered in a child protection context.

Signs of neglect

Neglect may be defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to;

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers)
- ensure access to appropriate medical care or treatment.
- be responsive to a child's basic emotional needs.

The following may be indicative of neglect of a child:

- the child is dirty, smelly, poorly clothed or appears underfed
- the child has lingering illnesses which are not attended to
- there is a marked deterioration in schoolwork
- the child exhibits significant changes in behaviour, aggressive behaviour, severe tantrums
- an air of 'detachment' or a 'don't care' attitude
- overly compliant behaviour
- a child who is reluctant to go home or is kept away from school for no apparent reason
- 'tummy pains' with no medical reason
- running away from home, suicide attempts
- extreme anger, sadness or depression
- child left with adults who are intoxicated or violent

Safeguarding & Child Protection Policy

- child left alone for excessive periods
- child thrives away from home environment.

Affluent neglect

Staff should also be aware of the impact of affluent neglect, which refers to the neglect experienced by children in more wealthy families. This can be difficult to identify, as the type of neglect experienced by children in these circumstances is often emotional.

Parents may work very long hours or be absent for extended periods, leaving children in the care of paid carers. This can create an emotional disconnect and leave children feeling isolated and lonely, with their emotional needs unfulfilled by their parents.

Affluent parents may also subject their children to a high amount of pressure to succeed academically, or in other pursuits such as sport or music, which can lead to psychological and emotional problems.

Absent parents may also have little knowledge of what their children are doing.

This can lead to increased risks with children who may spend long periods online or at an older age have the financial means to facilitate drug abuse and the independence to engage in harmful sexual activity.

Specific safeguarding issues

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk. Below are some safeguarding issues all staff should be aware of.

Extensive guidance on a wide variety of specific issues can be found in **Annex B of KCSIE** and in other guidance listed at the end of this policy.

- Child abduction and community safety incidents
- Children missing from education – also see Attendance Policy
- Children and the court system
- Children missing from education
- Children with family members in prison
- Child criminal exploitation (CCE) (including county lines/gangs) & child sexual exploitation (CSE)domestic abuse
- Fabricated or induced illness
- Homelessness
- So-called 'honour based' abuse, female genital mutilation (FGM) and forced marriage
- Mental health
- **Child-on-child** abuse including: Nudes/semi-nudes, youth produced sexual imagery
- o Sexual violence and sexual harassment
- o Up-skirting
- o Online behaviour and cybercrime

Safeguarding & Child Protection Policy

- Private fostering
- Preventing radicalisation (including Channel)

Guidance and practical support on specific safeguarding issues or concerns will be sought where necessary by the DSL.

The DSL will ensure that staff are aware of specific issues including, but not limited to: **child-on-child** abuse; sexual violence and sexual harassment; online abuse, including imagery; domestic abuse; parents affected by drug or alcohol abuse; child sexual exploitation, female genital mutilation; fabricated or induced illness; children missing education; preventing radicalisation; mental health

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child.

Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed.

There are two age-appropriate guides to support children 5–11-year-olds and 12–17-year-olds available on the gov.uk website.

5–11-year-olds: https://www.gov.uk/government/publications/young-witness-booklet-for-5-to-11-year-olds

12–17-year-olds: https://www.gov.uk/government/publications/young-witness-booklet-for-12-to-17-year-olds

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The schools may refer some parents and carers to this service where appropriate.

Children who are absent from education

At Eaton House Schools we adhere to the 'Working Together to Improve School Attendance' (2024) guidance. All staff should be aware of the safeguarding responsibilities for children who are absent from education, particularly on repeat occasions, or for prolonged periods, to help identify the risk of abuse and neglect, including sexual abuse or exploitation, and to help prevent the risks of them going missing in future.

Safeguarding & Child Protection Policy

Our organisation's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

Further information and support which our organisation draws upon, includes:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1099677/Working_together_to_improve_school_attendance.pdf

Children missing education - DfE statutory guidance

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf

Child missing from home or care - DfE statutory guidance

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/307867/Statutory_Guidance_-_Missing_from_care__3_.pdf

Children and adults missing strategy - Home Office strategy

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/117793/missing-persons-strategy.pdf

Further information for colleges providing education for a child of compulsory school age can be found in: Full-time-Enrolment of 14- to 16-year-olds in Further Education and Sixth Form Colleges.

https://www.gov.uk/government/publications/full-time-enrolment-of-14-to-16-year-olds-in-further-education-and-sixth-form-colleges/full-time-enrolment-of-14-to-16-year-olds-in-further-education-and-sixth-form-colleges-2023-to-2024-academic-year

We adhere to the following procedures and processes to ensure there is an appropriate safeguarding response to children who are absent from education:

- All pupils are recorded on the Schools admission register and their attendance is recorded in the daily attendance register.
- Staff must be aware that repeated absence may be an indicator of can be a potential indicator of abuse or neglect and repeated absence must be brought to the attention of the DSL.
- All unexplained absences will be followed up in accordance with the Attendance and Truancy Policy for each of the schools.
- The local authority is informed of any child whose name is added to or deleted from the admission register at a non-standard transition point, i.e. joining the school other than in the Nursery in September or leaving at any time other than the end of the summer term of Year 6 in accordance with the requirements of the *Education (Pupil Registration) (England) Regulations 2006 (as amended).*

Safeguarding & Child Protection Policy

- If a pupil leaves the schools, whether there are any concerns about that child or not, the schools will seek to obtain, for inclusion in the return the name of the future school, the expected date of the child's first day there, and, if applicable, the family's new home address and the date on which the family will be moving to it.
- The schools will also follow up directly by phone call or email with any future school to establish that the leaver has indeed turned up on day one at their intended destination
- If there are concerns about a pupil and a parent refuse to supply the information this may also result in a report to Children's Services.
- The school will inform the local authority of any pupil who fails to attend school regularly or who has been absent without the Schools permission for a continuous **period of ten days or more.**
- However, our organisation will endeavour to deal with any unexplained or unusual patterns of attendance or absence well before this statutory requirement and on most occasions before a **continuous period of 5 days.**
- If a pupil who has current involvement with Children's Services is absent from the school the normal procedure of a first day call to the home will be followed.
- The pupil's social worker must be informed of all absences promptly, and immediately, if no response is received or if no adequate or credible reason is given for the absence.
- When a pupil moves to another school, the DSL must inform the receiving school without delay that child protection records. Within 5 days the original records must be passed on either by hand or sent by Royal Mail Special Delivery Guaranteed or Royal Mail Signed For post and a receipt obtained at the post office at which the letter with the records is handed in. Duplicate records must be retained. Duplicate records should be kept securely until the pupil reaches the age of 25 years.
- The school holds contact details for both parents (unless a parent is deceased, or a parent has no contact with the child) and two emergency contact numbers.

Please also see the Attendance Policy.

Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Safeguarding & Child Protection Policy

Victims can be exploited even when the sexual activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

The schools are aware that often a child is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. However, staff must act on their concerns as they would for any other type of abuse.

Children also rarely self-report CSE so staff must be particularly vigilant to potential indicators of risk.

There are three main types of child sexual exploitation:

Inappropriate relationships:

Usually involves just one abuser who has inappropriate power –physical, emotional or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.

Boyfriend:

Abuser grooms the victim by striking up a normal relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims are required to attend parties and sleep with multiple men and threatened with violence if they try to seek help.

Organised exploitation and trafficking:

Victims are trafficked through criminal networks – often between towns and cities – and forced or coerced into sex with multiple men. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.

Any concerns that a child is being or is at risk of being sexually exploited should be passed immediately to the DSL. If a child is in immediate danger the police should be called on 999.

Child Criminal Exploitation (CCE) including gangs and County Lines

CCE is also a form of abuse and involves taking advantage of an imbalance in power to coerce, manipulate or deceive a child into criminal activity.

Criminal exploitation of children is a typical feature of county lines criminal activity where children and young people are recruited to transport drugs. Key identifying features of involvement in county lines are when children are missing.

Staff should be aware of the key indicators of children being sexually or criminally exploited which can include:

- Going missing for periods of time or regularly coming home late,
- regularly missing school or education or not taking part in education,
- appearing with unexplained gifts or new possessions,
- associating with other young people involved in exploitation,
- having older boyfriends or girlfriends,

- suffering from sexually transmitted infections,
- mood swings or changes in emotional wellbeing,
- drug and alcohol misuse,
- displaying inappropriate sexualised behaviour.

Domestic abuse

Domestic abuse includes any incident or pattern of incidents of controlling, coercive, threatening behaviours, 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 a wide range of behaviours and may be a single incident or a pattern of incidences. The abuse can be but not limited to, psychological, physical, sexual, financial and emotional.

Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and / or suffer domestic abuse in their own intimate relationships **(teenage relationship abuse).** All of which can have a detrimental long-term impact on their health, well-being, development, and ability to learn.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.

Domestic abuse may lead to other safeguarding concerns and should therefore be managed under this policy.

All staff are aware that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. We understand that children can be victims of domestic abuse. Where they see, hear or experience the effects, this can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Extra-familial Harms

All our staff, but especially the designated safeguarding lead (and deputies) will 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 abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (***teenage relationship abuse***)**, criminal exploitation, serious youth violence, county lines, and radicalisation.

Multi-agency practice principles for responding to child exploitation and extra-familial harm – non-statutory guidance for local areas, developed by the Tackling Child Exploitation (TCE) Support Programme, funded by the Department for Education and supported by the Home Office, the Department for Health and Social Care and the Ministry of Justice can be found at:

https://tce.researchinpractice.org.uk/

https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners

Safeguarding & Child Protection Policy

Operation Encompass

When police are called to an incident of domestic abuse and there is a child(ren) in the household the police will usually inform the DSL in the schools before the child(ren) arrives at the schools the following day. This ensures that the schools have up to date relevant information about the child's circumstances and can enable appropriate support to be given to the child.

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead (or deputy)) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs.

Operation Encompass **does not replace statutory safeguarding procedures**. Where appropriate, the police and/or schools should make a referral to local authority children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website. Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse.

The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate)

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property.

So called 'honour based' abuse (HBA)

HBA is a collection of practices, which are used to control behaviour and exert power within families to protect perceived cultural and religious beliefs and/or honour.

Such abuse can occur when perpetrators perceive that an individual has shamed the family and/or community by breaking their honour code this includes Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

Safeguarding & Child Protection Policy

There is a statutory duty on teachers to personally report to the Police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate.

If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a pupil is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or it involves a pupil over 18, teachers should follow the Schools local safeguarding procedures.

Female Genital Mutilation

Female genital mutilation (FGM) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is a form of child abuse and is illegal in the UK. A pupil may have difficulty walking, sitting or standing and may even look uncomfortable. A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating. There may be prolonged or repeated absences from school and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupil's return.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHCE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

Mandatory Reporting of FGM

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. This will usually come from a disclosure.

Under no circumstances should school staff physically examine pupils.

The duty applies to the individual who becomes aware of the case to make a report direct to the Police by dialling 101.

The report should be made immediately.

The duty to report should not be transferred to the DSL, however the DSL **must be informed**. Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including by dialling 999 if appropriate.

Safeguarding & Child Protection Policy

Forced Marriage

A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. A forced marriage is not the same as an arranged marriage which is common in many cultures. Forcing a person into a marriage is a crime in England and Wales.

The Forced Marriage Unit (FMU) has created: multi-agency practice guidelines: handling cases of forced marriage (pages 75-80 of which focus on the role of schools and colleges) and, multi-agency statutory guidance for dealing with forced marriage, which can both be found at The right to choose: government guidance on forced marriage -

GOV.UK (Welcome to GOV.UK (www.gov.uk))

School staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk

In addition, **since February 2023** it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Mental health

Schools and colleges have an important role to play in supporting the mental health and

wellbeing of pupils. Mental health problems can also, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Early intervention to identify issues and provide effective support is crucial. The Schools role in supporting and promoting mental health and wellbeing can be summarised as:

- Prevention: the creation of a safe, calm school environment where mental health problems are less likely, improving the mental health and wellbeing of the whole school population, and equipping pupils to be resilient so that they can manage the normal stresses of life effectively.
- This includes teaching pupils about mental wellbeing through the curriculum and reinforcing this teaching through school activities.
- Identification: recognising emerging issues as early and accurately as possible
- Early support: helping pupils to access early support and intervention
- Access to specialist support: working effectively with external agencies to provide swift access or referrals to specialist support and treatment.

When the schools suspect that a pupil is having mental health difficulties, support will be put in place, using a graduated response process.

1. an assessment to establish a clear analysis of the pupil's needs.
2. a plan to set out how the pupil will be supported.
3. action to provide that support.
4. regular reviews to assess the effectiveness of the provision

Adverse Childhood Experiences (ACEs) and other events may also have an impact on pupils.

These include:

- loss or separation – resulting from death, parental separation, divorce, hospitalization
- loss of friendships (especially in adolescence)
- family conflict or breakdown that may result in the child having to live elsewhere, being taken into care or adopted, deployment of parents in armed forces families
- life changes – such as the birth of a sibling, moving house or changing schools or during transition from primary to secondary school• traumatic experiences such as abuse, neglect, domestic violence, bullying, violence, accidents or injuries.
- other traumatic incidents such as a natural disasters or terrorist attacks - Where children - experience a range of emotional and behavioural problems that are outside the normal range for their age, they might be described as experiencing mental health problems or disorders.
- Mental health professionals have classified these as:
- emotional disorders - phobias, anxiety states and depression
- conduct disorders - stealing, defiance, fire-setting, aggression and antisocial behaviour
- hyperkinetic disorders - disturbance of activity and attention
- developmental disorders - delay in acquiring certain skills such as speech, social ability or bladder control, primarily affecting children with autism and those with pervasive developmental disorders
- attachment disorders - children who are markedly distressed or socially impaired as a result of an extremely abnormal pattern of attachment to parents or major care givers
- Trauma disorders, such as post-traumatic stress disorder, as a result of traumatic experiences or persistent periods of abuse and neglect
- other mental health problems including eating disorders, habit disorders, somatic disorders; and psychotic disorders such as schizophrenia and manic-depressive disorder

Only appropriately trained professionals can make a diagnosis of a mental health problem.

School and college staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

If staff have any concerns about the mental health of a child, they should report this to the DSL immediately following the procedures outlined in this policy.

More information can be found in the DfE 'Mental Health and Behaviour in Schools guidance.

Child-on-Child Abuse (formerly known as Peer-on-peer abuse)

(also see Anti-bullying policy, Staff Behaviour Safeguarding (Code of Conduct) Policy, PHSE and RSE Policies)

Children are also vulnerable to abuse by their peers. The school has a zero-tolerance approach to such abuse and it will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". Staff will always challenge such behaviours. Any child can be vulnerable to **child-on-child** abuse and staff should be alert to signs of such abuse amongst all children. However, individual, and

situational factors can increase a child's vulnerability to abuse by their peers. For example; children who are more likely to follow others and/or who are socially isolated from their peers may be more vulnerable as may pupils with SEND or certain medical conditions. Children who are LGBT can also be targeted by their peers. In some cases, a pupil who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Children who are lesbian, gay, bisexual, or trans (LGBT)

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, in line with 'Keeping Children Safe in Education', we recognise that these children and in some cases children who are perceived by other children to be lesbian, gay or bisexual can be just as vulnerable as children who are.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. Our staff will therefore endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns whenever needed.

LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and staff will be made aware of the range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse from the statutory guidance available.

All children involved whether victim or perpetrator will be treated as "at risk" and supported. The school recognises the gendered nature of **child-on-child** abuse and that it is more likely that girls will be victims and that boys will be perpetrators, but all **child-on-child** abuse is unacceptable and will be taken seriously.

Staff are made aware that **child-on-child** abuse may happen inside or outside school or online and that that even if there are no reports in the school it does not mean **child-on-child** abuse is not happening, it may be the case that it is just not being reported. A member of staff receiving an allegation of abuse by a pupil, or with concerns about a pupil, should report this immediately to the DSL following the reporting procedures outlined above.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence and sexual harassment (see below and Part five of KCSIE)
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Up-skirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission

- Initiation/hazing type violence and rituals.

Where a child or young person may be asked to perform an act or series of inappropriate acts to gain membership to a group or partake in the wearing of a plastic bag over their head to allegedly heighten sexual experience before they pass out.

Through safeguarding training and anti-bullying training, staff will be made aware of Schools Pupil Behaviour, Discipline and Exclusions Policy, Anti-bullying Policy and safeguarding procedures as appropriate.

- It may be appropriate to regard a young person's behaviour as abusive if:
- There is a large difference in power (for example age, size, ability, development) between the young people concerned.
- The perpetrator has repeatedly tried to harm one or more other children.
- There are concerns about the intention of the alleged perpetrator.
- There is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm

The DSL will not undertake any enquiry or investigation where a case is referred to Children's Services or the police.

The initial assessment of any allegation will be made by Children's Services and the DSL to judge whether there is a need for immediate action to protect the pupils involved, whether the allegation is demonstrably false or whether there has been inappropriate behaviour that can be dealt with through the Schools usual disciplinary procedures.

The DSL will lead enquiries at the Schools level if agreed with the relevant investigating agencies.

The DSL will inform the parents of the pupil making the allegation and explain the likely course of action. If Children's Services or the police have been informed the schools will follow the relevant agency's guidance about what information may be disclosed and to whom.

The DSL will ensure the parents of the pupil who is the alleged perpetrator are informed about the allegation and the likely course of action. If Children's Services or the police have been informed the school will follow the relevant agency's guidance about what information may be disclosed and to whom.

The necessary support and any required sanctions following **child-on-child** abuse will be determined on a case-by-case basis.

The Head Teachers/Principal will make the decision whether or not to suspend or exclude the pupil(s) involved.

The DSL will keep a written record of all conversations with parents and other professionals and any decisions made

The management of pupils with harmful behaviour (including sexually harmful behaviour) can be complex. The schools will follow guidance and work with other relevant agencies to support perpetrators and to maintain the safety of the whole school community.

Safeguarding & Child Protection Policy

Appropriate support in schools, and from outside agencies if applicable, will also be put in place for any victims or any other pupil affected. The support offered in these circumstances will be determined on a case-by-case basis depending on the circumstances.

If pupils are found to have made malicious allegations, appropriate sanctions will be applied, which could include temporary or permanent exclusion.

Strategies to reduce the risk of child-on-child abuse

Preventative strategies for **child-on-child** abuse are regularly considered. Eaton House Schools has an ethos where pupils feel safe to share information about anything that is upsetting them and any derogatory language or behaviour is always by staff.

There is a strong and positive PHSE and RSE curriculum and pastoral care system, which gives pupils an open forum to talk things through and explore disputes or difficulties. The IT curriculum also teaches pupils about acceptable online behaviour.

The School Council provides a 'pupil voice' and encourages pupils to develop the rules and boundaries of acceptable behaviour.

Prejudiced Behaviour

Pupils may also display hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities, special educational needs, medical conditions, ethnic, cultural and religious backgrounds, gender, home life and sexual identity. These factors can make it more difficult for a child to report abuse.

Child-on-child Abuse - sexual violence and sexual harassment

The school also has a **zero-tolerance** approach to any form sexual violence and sexual harassment; it is never acceptable and **will not be tolerated.**

All staff working or volunteers working in our organisation have been advised to maintain an attitude of **"it could happen here".**

Staff have been trained to be aware of and respond to ALL reports and concerns relating to sexual violence and / or sexual harassment both online and offline, including those which might be happening outside the school. Our DSL will take charge of procedures following a report on sexual violence / sexual harassment.

Sexual violence and sexual harassment can occur between children or groups of children of any age and sex, and within intimate personal relationships between peers.

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 must never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, or any other form of abuse. Nor should a victim ever be made to feel ashamed for making a report.

Safeguarding & Child Protection Policy

However, it should be made clear to any alleged victim that their information stated may have to be passed onto relevant people to help support them with their disclosure.

Staff should follow the processes outlined in this policy when dealing with any report of sexual violence or sexual harassment, including those that have happened outside the school and/or online.

A child displaying harmful sexual behaviour may also be an indication that they are a victim of abuse themselves.

When responding to a report of sexual violence the DSL will decide on the response following the advice in Section 5 of KCSIE.

This will include

• Initial response - considering the needs of both victim(s) and alleged perpetrator(s).

The victim will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support they will be offered.

This however will be balanced against the Schools duty and responsibilities to protect other children and the following factors below:

- The nature of the alleged incident (s), including whether a crime may have been committed and /or whether Harmful Sexual Behaviour (HSB) has been displayed.
- The ages of children involved.
- The developmental stages of the children involved.
- Any power imbalance between the children – are alleged perpetrators significantly older, more mature, confident and well-known social standing? Does the victim have a disability or learning difficulty?
- Is the incident a one-off or sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- Has the sexual violence / harassment taken place within an intimate personal relationship?
- Importance of understanding intra familial harms and any necessary support for siblings following incidents.
- Any on-going risks to victim, other children, adult students or school or college staff?
- Other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation?

The DSL will also review the following when responding to a report of sexual violence in order to make sure the right procedures are carried out

- Record Keeping
- Risk Assessment of the disclosure / event.
- Consideration of most appropriate response: internal management, early help, referral to Children's Social Care and/or referral to the Police.
- Ongoing response – safeguarding and support for all parties

Safeguarding & Child Protection Policy

The DSL will not undertake any investigation where it is decided a case must be referred to Children's Services or the police.

The initial assessment will be made by Children's Services and the DSL to judge whether there is a need for immediate action to protect the pupils involved. The DSL will lead enquiries at the Schools level if agreed with the relevant investigating agencies.

Support will depend on the circumstances of each case and the needs of the child, it may include completion of risk assessments to support children to remain in school whilst safeguarding other children and the victim, delivery of early intervention in respect of HSB and/or referral to The Harbour Centre Sexual Assault Referral Centre (SARC) where a pupil discloses a rape, an attempted rape or a serious sexual assault whether this has happened recently or in the past. The SARC also has a 24/7 helpline 01603 276381 if pupils or staff need to speak to a Crisis Worker for help & advice. Referral forms can be found on The Harbour Centre website. The DSL will always contact the police in cases of rape and serious sexual assault as per the guidance When to call the Police: a guide for schools and colleges, National Police Chiefs Council.

The DSL will inform the parents of the pupil making the allegation and the alleged perpetrator and will explain the course of action, unless this is considered to place either of them at further harm.

If Children's Services or the police have been informed the school will follow the relevant agency's guidance about what information may be disclosed and to whom.

The DSL will keep a written record of all conversations with parents and other professionals and any decisions made.

Considering confidentiality and anonymity

Confidentiality

Staff taking a report should never promise confidentiality as it is very likely that it will be in the best interest of the victim to seek advice and guidance from others to provide support and engage appropriate agencies.

The schools will only engage staff and agencies who are required to support the children involved and/or be involved in any investigation.

The victim may ask the schools not to tell anyone about the sexual violence or sexual harassment. There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies.

For example, the public task basis may apply, where the overall purposes is to perform a public interest task or exercise official authority, and the task or authority has a clear basis in law.

Staff MUST seek advice from the designated safeguarding lead (or deputy), who will consider the following:

Safeguarding & Child Protection Policy

- parents or carers should normally be informed (unless this would put the victim at greater risk)
- the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care, and the police.

Rape, assault by penetration and sexual assaults are crimes.

Where a report of rape, assault by penetration or sexual assault is made, this will be referred to the police.

Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

Ultimately, the designated safeguarding lead (or a deputy) will have to balance the victim's wishes against their duty to protect the victim and other children.

If the designated safeguarding lead (or a deputy) decide to go ahead and make a referral to local authority children's social care and/or a report to the police against the victim's wishes, this will be handled extremely carefully, and the reasons will be explained to the victim and appropriate specialist support will be offered to the child**.**

Anonymity

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, appropriate staff will be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately.

We will do all we can as an organisation to protect the anonymity of any children involved in any report of sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the children involved.

We will also consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

The management of pupils with harmful behaviour (including sexually harmful behaviour) can be complex. The schools will follow guidance and work with other relevant agencies to support perpetrators and to maintain the safety of the whole school community.

Any sanctions required following a report of **child-on-child** abuse will be determined on a case-by-case basis.

Risk assessment

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual

harassment, the need for a risk assessment will be considered on a case-by-case basis. The risk and needs assessment for a report of sexual violence will consider:

- the victim, especially their protection and support
- whether there may have been other victims
- the alleged perpetrator(s)
- all the other children, (and, if appropriate, adult students and staff) at the schools, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms, and
- The time and location of the incident, and any action required to make the location safer.
- Risk assessments should be recorded (paper or electronic) and will be kept under review. At all times, we will be actively considering the risks posed to all our children and young people and put adequate measures in place to protect and keep the child safe.

Appropriate Support for Victim and Perpetrator

Appropriate support in schools, and from outside agencies if applicable, will also be put in place for any victims or any other pupil affected. The support offered in these circumstances will be determined on a case-by-case basis depending on the circumstances.

This will include pastoral support for both perpetrator and / or victim, through in-house counselling, reflection or behaviour modification support which may also be sought from external specialist agencies.

In all cases the schools will monitor the progress of both perpetrator and victim to ensure that this type of behaviour does not occur again.

E-safety and online behaviour

The school adopts a whole school approach to online safety which seeks to reduce risk as far as possible without depriving pupils of the significant benefits provided by technology and the internet. Computing and PSHCE lessons are used to help pupils to understand and avoid the risks associated with 'online activity'.

The breadth of issues classified within online safety is considerable, but can be categorised into four main areas of risk:

- content: being exposed to illegal, inappropriate, or harmful material
- contact: being subjected to harmful online interaction with other users
- conduct: personal online behaviour that increases the likelihood of, or causes, harm.
- commerce: - risks such as online gambling, inappropriate advertising, phishing and or financial scams

Eaton House Schools Staff Behaviour Safeguarding (Code of Conduct) Policy and ICT Acceptable Usage Policy explain the responsibilities of staff in relation to keeping pupils safe online.

Safeguarding & Child Protection Policy

Eaton House Schools does all it reasonably can to limit the pupil's exposure to the above risks in school. It has sophisticated filters and monitoring systems in place, which are designed to protect them from online abuse without imposing unreasonable restrictions and preventing pupils benefitting from the wealth of resources available online.

Pupils also receive guidance on the safe use of the internet and are educated about the risk of online harm (including anti-bullying) primarily through their Computing and PSHCE lessons.

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

Social networking sites and other apps can be sources of risk of inappropriate and harmful behaviour. If staff suspect that a pupil may be at risk of or suffering from online harm, they should follow the reporting procedures set out in this policy.

Remote Education

Remote education can be defined as when the Eaton House Schools are in regular contact with pupils who have logged onto the system for receiving the delivery of educational lessons over the internet. This method of delivery is classed by our organisation as *lone working* if only one tutor is working with one pupil over the internet e.g. holding a tutorial or an online peripatetic lesson.

Therefore, specific arrangements must be in place to safeguard both parties involved in the session. All our staff who deliver online learning will be appropriately trained to do so.

Eaton House Schools will ensure that those communications will be used to reinforce the importance of children being safe online and enable parents and carers to understand what systems Eaton House Schools uses to filter and monitor online use.

Parents and/or carers will be made aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from Eaton House Schools and if their child is going to be interacting with online.

Filters and monitoring

Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, our Board of Governors will do all they can to limit our children's exposure to the above risks from the Eaton House Schools IT system.

Youth produced sexual imagery, nudes/semi-nudes, sexting, up-skirting

The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute inappropriate imagery (nudes, semi-nudes, sexting) in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal.

Up-skirting is also a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their

genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.

Anyone of any gender can be a victim.

If a member of staff becomes aware of an incident involving inappropriate material (whether this has taken place in or out of school) they should follow the safeguarding procedures and report it to the DSL immediately.

The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view images, delete images or look for further images. They should not copy or print images, nor forward images by email or any other electronic means.

Parents / carers will be informed at an early stage of inappropriate online behaviour, unless there is reason to believe that involving parents would put the pupil at risk of harm.

If there is concern a young person has been harmed or is at risk of harm a referral will be made to Children's Services, or the police following the procedures as outlined above.

Thresholds of Sexual behaviour by children

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate, or abusive will hinge around the related concepts of true consent, power imbalance and exploitation.

Developmental sexual activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional, and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

Abusive sexual activity includes any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.

Children's sexual behaviour is usually categorised by professionals using the following **'traffic light' approach:**

Green behaviours reflect safe and healthy sexual development. They

are:

- Displayed between children or young people of similar age or developmental ability
- Reflective of natural curiosity, experimentation, consensual activities, and positive choices

Amber behaviours have the potential to be outside safe and healthy development. They may be:

- Unusual for that particular child or young person
- Of potential concern due to age or developmental differences

Safeguarding & Child Protection Policy

- Of potential concern due to activity type, frequency, duration or the context in which they occur.

Amber behaviours signal the need to make a report to the DSL.

Red behaviours are outside safe and healthy behaviour. They may be:

- Excessive, secretive, compulsive, coercive, degrading or threatening
- ii. Involving significant age, developmental or power differences
- iii. Of concern due to the activity type, frequency, duration or the context in which they occur.

Red behaviours would indicate a need for referral to Children's Services.

Preventing Radicalisation

As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people being drawn into terrorism'. This is known as the **'Prevent Duty'**. Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of Eaton House Schools safeguarding approach.

Radicalisation refers to the process of legitimising support, or use of terrorist violence.

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs that aims to:

1. negate or destroy the fundamental rights and freedoms of others; or
2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
3. intentionally create a permissive environment for others to achieve the results in (1) or (2).

It can also call for the death of members of the armed forces, whether in this country or overseas.

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

Recognising Extremism

Early indicators of radicalisation or extremism may include:

- Showing sympathy for extremist causes
- Glorifying violence, especially to other faiths or cultures
- Making remarks or comments about being at extremist events or rallies outside school
- Evidence of possessing illegal or extremist literature
- Advocating messages similar to illegal organisations or other extremist groups
- Out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)

Safeguarding & Child Protection Policy

- Secretive behaviour
- Online searches or sharing extremist messages or social profiles
- Intolerance of difference, including faith, culture, gender, race or sexuality
- Graffiti, artwork or writing that displays extremist themes
- Attempts to impose extremist views or practices on others
- Verbalising anti-Western or anti-British views
- Advocating violence towards others

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.

We recognise that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability. At Eaton House Schools, we will ensure that:

- Through training, staff, volunteers and governors have an understanding of what radicalisation and extremism is, why we need to be vigilant in school and how to respond when concerns arise.
- There are systems in place for keeping pupils safe from extremist material when accessing the internet in our school by using effective filtering and usage policies.
- The DSLs has received Prevent training and will act as the point of contact within our school for any concerns relating to radicalisation and extremism.
- Through our curriculum, we will promote the spiritual, moral, social and cultural development of pupils.
- The DSL will make referrals in accordance with Wandsworth Channel Procedures

https://www.wandsworth.gov.uk/community-safety/counter-terrorism-and-counter-extremism/prevent-counter-terrorism/#:~:text=However%2C%20anyone%20in%20Wandsworth%20can,best%20way%20to%20provide%20support.

https://www.rbkc.gov.uk/lscp/information-professionals-and-volunteers/radicalisation-and-extremism

Private Fostering

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 years old or 18 years old if the child is disabled.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care as soon as possible. However, where a member of staff becomes aware that a child may be in a private fostering arrangement, they must notify the DSL immediately.

Fabricated Illness

Safeguarding & Child Protection Policy

Fabricated or induced illness is a condition whereby a child has suffered, or is likely to suffer, significant harm through the deliberate action of their parent and which is attributed by the parent to another cause.

There are three main ways of the parent fabricating (making up or lying about) or inducing illness in a child:

- Fabrication of signs and symptoms, including fabrication of past medical history.
- Fabrication of signs and symptoms and falsification of hospital charts, records, letters and documents and specimens of bodily fluid.
- Induction of illness by a variety of means

Further information may be found at :- https://www.londoncp.co.uk/fab_ind_ill.htm

Safeguarding & Child Protection Policy

Appendix 2: Human Rights and Equality Act

Human Rights Act

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them. Under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention.

The specific convention rights applying to schools and colleges are:

• Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
• Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
• Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination, and Protocol 1,
• Article 2: protects the right to education. Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. Further information (including on absolute and qualified rights) can be found at Human Rights | Equality and Human Rights Commission (equalityhumanrights.com).

Equality Act 2010

Schools and colleges have obligations under the Equality Act 2010 (the Equality

Act 2010).

According to the Equality Act, schools and colleges must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).

Whilst all of the above protections are important, in the context of safeguarding, this guidance, and the legal duties placed on schools and colleges in relation to safeguarding and promoting the welfare of children, governing bodies and proprietors should carefully consider how they are supporting their pupils and students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race.

Provisions within the Equality Act allow schools and colleges to take positive action, where it can be shown that it is proportionate, to deal with disadvantages affecting pupils or students with a particular protected characteristic   to meet their specific need, this includes a duty to make reasonable adjustments for disabled children and young people, including those with long term conditions. A

Safeguarding & Child Protection Policy

school or college, could, for example, consider taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment.

Guidance to help schools understand how the Equality Act affects them and how to fulfil their duties under the act can be found at Equality Act 2010: advice for schools -GOV.UK (www.gov.uk), it may also be useful for colleges. For further information Equality Act guidance | Equality and Human Rights Commission (equalityhumanrights.com).

Safeguarding & Child Protection Policy

EATON HOUSE SCHOOLS

ICT ACCEPTABLE USAGE POLICY

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1

Contents

Policy Statement

This policy is designed to make clear the responsibilities of staff in regard to the use of Eaton House Schools computer hardware and facilities.

Organisation of ICT usage

The organisation of ICT usage is the responsibility of the IT Manager.

Responsibilities for ICT usage

In relation to ICT usage, the IT Manager, is responsible for:

- ensuring that this acceptable use of ICT policy is made available to all staff and that appropriate acceptable use guidelines are displayed prominently around the School. The ICT Usage policy is provided to new staff during the staff induction process and is available on the School website in the staff portal.

- putting systems in place to identify staff training needs

- ensuring that any information or data stored on the cloud is protected and personal data is kept secure

- recommending any improvements to ICT systems to ensure the security and safety of the network.

Responsibilities of Staff

Staff have a responsibility, as part of the Eaton House Schools ICT policy, to comply with the following usage policy:

Use of the internet on School premises should principally be for School use, e.g. accessing learning resources, educational websites, researching curriculum topics, use of email on School business.

Staff are allowed to use School equipment, when it is not required by pupils, outside their own individual working hours. This includes laptops provided for the use of one or more members of staff. It also includes the use of e-mail, the broadband link, the School network and the internet.

Equipment provided on short-term or long-term loan to staff remains the property of the School and must be available for inspection at all reasonable times. If a laptop is provided, it is expected that it should be brought to School on a regular basis.

Use of the Schools internet for personal financial gain (including the use of online auction sites), gambling, political purposes or advertising is excluded.

Teachers should not be accessing the internet for personal reasons whilst teaching children. This includes accessing the internet via their mobile phones whilst teaching or supervising children.

In no circumstances should members of staff access websites that are clearly inappropriate (e.g. those that could be considered pornographic, racist, sexist or otherwise offensive). It is possible to access such sites by accident, in which case an individual member of staff should report this to his/her line manager. Evidence of repeated visits to such sites, the downloading of materials from such sites and the use of search criteria (e.g. individual words) that might lead to such sites, will be treated as a disciplinary matter.

There is software in place to monitor all usage by pupils and staff of the School network. Staff should also be aware that computers usually "leave a trail" of documents worked on, websites visited, emails sent/received and so on.

Members of staff should not send or circulate emails which are offensive.

It is imperative that staff protect their password(s) at all times. Staff must log off when they are leaving a computer, even for a short time, since the security of the intranets and internet depend on the staff member locking their computer.

The School recognises that information can be accessed online through the 'streaming' of data, i.e. radio, television, music, etc. Teaching staff should only be accessing streamed information if it is of educational interest to a lesson or to its planning. For example, using BBC iPlayer is acceptable if it is the interest of the class and related lessons. Streaming music for personal use is discouraged. This is due to the streaming process placing demands on the Schools internet bandwidth; as a result the internet can become slow for all users.

Staff are alerted to the fact that they should only download files from reliable sources. If in doubt, do not download and/or respond to emails from unknown sources.

Staff should never knowingly expose the network to risks, such as those from computer viruses or other malicious software or programs.

Staff should remember that any materials downloaded for publication must include an acknowledgement of the source.

All staff who use School ICT resources must do so with reference to UK decency laws, including the Computer Misuse Act 1990, and should report any misuse that they find evidence of to their line manager and the IT Manager.

Use of portable computer systems, USB sticks or any other removable media

All personal data including sensitive data, such as children's personal details and report comments, medical information must not be stored on portable devices.

Please refer to the Data Protection Policy and Privacy Notice Policy regarding to further information on personal data and data processing and protection.

Use of digital images

Any photos or videos taken by teachers, other adults (including parents), and the children themselves during any School activity (including educational visits) should not be put on public display, without express permission. Photos of children should not be published anywhere on the internet (including social networking sites such as Facebook).

The above excludes the publication of photos on the School website and the Schools social media platforms which must go through the marketing department for authorisation and alongside use by School for educational/display uses.

Use of School Hardware – Laptops, Cameras, Recording Equipment, etc.

Use of School laptops, cameras, video cameras and recording equipment is limited to activities directly related to School activity. They can be used during lessons, sporting activities, School visits and residential trips. They are not for personal use.

All data must be transferred to the School network as soon as possible to ensure that data is saved and protected. Once copied to the network the data must be deleted from the recording equipment.

Staff use of the School Network

All members of staff will be given a username and password. Staff must log onto the School network using only their own username and password. Staff are not permitted to use anyone else's details to log onto the School system.

Staff must not download software onto the School network before first liaising with the IT Manager.

Staff must not use personal product keys to install software onto the network. This is a breach of the terms of the software license, and therefore the School will be in breach of licensing laws.

School resources, such as software, etc. are for the use of staff and pupils within the School premises only and should NOT be taken home for personal use.

All external programs/software which are being considered whether online or on the computers must be authorised by the IT Manager before purchase.

Measurement and Review

Eaton House Schools will establish and maintain programmes for the review of ICT usage in School.

The IT Manager and DSLs ensure that appropriate filtering and monitoring systems are in place on School equipment, networks and when accessing internet in the Schools, (as per the DFE filtering and monitoring standards. This is reviewed annually.

Teaching staff ensure pupils are taught about online safety.

Education and Training

It is important that education and training are seen as being part of the productive use of ICT equipment. This training can be formal or informal. Through training, ICT usage can be made more productive.

Confidentiality

The School will have information about ICT usage (including access to the internet) but will not publish it without the written consent of the individual. Employees have a statutory right of access to their own records.

This does not preclude non-confidential records being reported to ensure the School has a basis on which to take remedial measures, safeguards and decisions affecting its employees'

interests.

Pupil use of the School Network and Equipment

Teaching staff will explain the code of practice for IT when using the Schools equipment and network. Year 4 and above pupils must understand and sign the Pupil ICT code of Practice Agreement prior to using the equipment and network.

ICT Pupil Code of Practice Agreement

1. I know that I will be permitted to use the internet if I use it responsibly. I understand that if I do not, I may not be allowed to use the internet at School.

2. I know that being responsible means I should not look for bad language, inappropriate images or violent games, and I know that if I accidentally come across any I should report it to a teacher or parent. I know that my teacher can check the websites I have visited.

3. I will log off when I have finished using the computer.

4. I will NEVER tell anyone I meet on the internet, my home address, my telephone number or my Schools name, or send a picture of myself. I will NEVER arrange to meet anyone in person.

5. If someone says or writes something whilst I am on the internet or gaming, which makes me feel uncomfortable or worried, I will always report it to a teacher or parent.

6. I will never answer unpleasant, suggestive or bullying emails or messages and I will always report them to a teacher or parent. I know not to delete them straight away but show them to the person I have reported it to, as evidence.

7. I will always be myself and not pretend to be anyone or anything I am not. I know that the posting of anonymous messages and the forwarding of chain messages is not allowed.

8. At School, I may not download any software from the internet. I know that information on the internet may not always be reliable and may need checking. I know that some websites may be sponsored by advertisers.

9. If I bring in memory sticks from outside School I will give them to the teacher to check for viruses and content, before opening a file.

10. I will be polite and sensible when I email or communicate with others online and will not send, or encourage material which may offend or annoy others or invade another person's privacy.

11. I know that I am not allowed to access personal e-mail, social networking sites or instant messaging in School.

12. If I bring a mobile phone to School I will take it to the SMT Office as soon as I arrive.

13. I will not change the settings on the desktop or internet browsers or mouse pointers as I know these are not my own personal computer and are School property.

I have read and understand the ICT Code of Practice for Pupils and agree to it.

Name: _____   Form: _____

Date: _____

ICT Staff Code of Practice Agreement

- Use of the internet on School premises should principally be for School use, e.g., accessing learning resources, educational websites, researching curriculum topics, use of email on School business.

- Whilst the School has a robust spam filter in place staff must remain vigilant and to not open any links if unsure whether the email has come from a legitimate source.

- Use of the Schools internet for personal financial gain (including the use of online auction sites), gambling, political purposes or advertising is excluded.

- Staff should only be accessing *streamed* information if it is of educational interest to a lesson or to its planning.

- Teachers should not be accessing the internet for personal reasons whilst teaching children. This includes accessing the internet via their mobile phones whilst teaching or supervising children.

- Use of the internet to access any illegal sites or inappropriate material is a disciplinary offence.

- All staff who use School ICT resources must do so with reference to UK decency laws, including the Computer Misuse Act 1990, and should report any misuse that they find evidence of to their line manager and the IT Manager.

- Staff must recognise that it is not appropriate to discuss issues relating to children or other staff via social networks.

- It is never acceptable to accept a 'friendship request' from pupils at the School, or ex-pupils who are minors. Member of staff should exercise their professional judgment at all times. Please refer to the Staff Behaviour- Safeguarding (Code of Conduct) Policy.

- All personal data including sensitive data, such as children's personal data details and report comments, medical information must not be stored on portable devices. Please refer to the Data Protection Policy and Privacy Notice Policy regarding to further information on personal data and data processing and protection.

- Teaching staff using the Engage App on their phone must ensure that they do not allow anyone else to access the App. It is password protected and the password must never be shared with anyone else.

- Memory sticks for Schoolwork should not contain children's personal data or any other sensitive data.

- Staff should NOT use their personal phones for taking photographs of children.

- Mobile phones should not be used when teaching, unless in an emergency.

- Any photos or videos taken by teachers, other adults (including parents), and the children themselves during ANY School activity (including educational visits) should not be put on public display, without express permission, and must not be published anywhere on the internet (including social networking sites such as Facebook).

- The above excludes the publishing of photos on the School website and the Schools social media platforms which must go through the marketing department for authorisation and alongside use by School for educational/display uses.

- Use of School laptops, cameras, video cameras and recording equipment is limited to activities directly related to School activity. They are not for personal use.

- All data must be transferred to the School network as soon as possible to ensure that data is saved and protected. Photos and videos must be deleted from laptops, cameras, video cameras and recording equipment.

- Staff must log onto the School network using their own username and password only. Staff must not access the School network using the a*dministrator* username and password or any other person's log in details.

- Staff must not download software onto the School network.

- Staff should not be using personal product keys to install software onto the network.

- School resources are for the use of staff and pupils within the School premises only and should NOT therefore be taken home for personal use.

- Staff must always lock computers when leaving the classroom/room. This is to protect personal data and to prevent unauthorised persons accessing the School system and personal data of pupils, parents and staff.

- I understand the importance of training to ensure productive use of ICT equipment and safe practices and confirm that all training will be completed as and when required.

It should be understood by all staff that this Code of Practice is in place to protect staff from potential risk in their use of ICT in their everyday work.

I confirm that I have read and understood the Acceptable Use Policy for ICT and agree to abide by it.

Name:_____   Signature:_____

Date:_____

EATON HOUSE SCHOOLS

ANTI-BULLYING

POLICY

Author:	Mani Giri (Compliance Manager)
Responsibility:	Mrs Roosha Sue (Head, EHTM Nursery)
	Mrs Claire Fildes (Head, EHTM Girls')
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	Mr Ross Montague (Head, EHB)
	Mrs Sarah Segrave (Head of Prep, EHTM and Principal, Eaton House Schools)
Reviewed:	August 2024
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CONTENTS

Policy Statement

The aim of this policy is to provide pupils with a safe and secure School environment free from bullying and harassment. Bullying damages lives and it is recognised that all School are likely to have a problem with bullying at some time.

We aim to provide the means and opportunity for pupils to let us know if bullying occurs and the strategies to deal with it when it does. This policy aims to produce a consistent response by the School to any bullying incidents that may take place.

Aims & Objectives

At Eaton House Schools, our aim is that staff, children and parents work together to create a happy, caring learning environment in line with our School rule "Be Kind". We are committed to providing a safe and caring environment that is free from disruption, violence and any form of harassment so that every one of our pupils can develop to his/her full potential. We expect our pupils to treat members of staff with courtesy and co-operation so that they can learn in a relaxed, but orderly, atmosphere. All pupils should care for and support each other. Our aim is to make the School one in which bullying has no place and to have a whole School approach to ensuring safety, security, openness and confidence.

Eaton House Schools prides itself on its respect and mutual tolerance. Parents/guardians have an important role in supporting Eaton House Schools in maintaining high standards of behaviour. It is essential that School and home have consistent expectations of behaviour and that they co-operate closely together. Acceptance of this policy forms part of our standard terms and conditions. This policy is available to parents of pupils and prospective pupils on our website and on request. It is also available and known to staff and pupils, including junior and recently appointed staff.

Bullying, harassment, victimisation and discrimination will not be tolerated. We treat all our pupils and their parents fairly and with consideration and we expect them to reciprocate this towards each other, the staff and the School. Any kind of bullying is unacceptable. This policy applies to all pupils in the School, including those in the Early Years Foundation Stage.

All members of the School are expected to help to create an atmosphere in which bullying will be spoken of openly, taken seriously and responded to with appropriate action. Any pupil who is being bullied should tell his or her parents, and preferably his or her Form Teacher or another member of staff. It is important that any cases of bullying are reported to someone whom the victim feels able to talk to.

Staff awareness is raised through discussion in staff meetings, and action is taken to reduce the risk of bullying at times and in places where it is most likely to occur.

Objectives

- To raise awareness of the Schools expectations in terms of behaviour and to adhere to our Code of Conduct.
- To communicate effectively to all members of the School community the Schools stance on bullying
- To engage members of the School community in reaching a shared understanding of what bullying is.
- To communicate effectively to all members of the School community the Schools policy and procedures
- To promote an open atmosphere in which victims and witnesses know that it is right "to tell" and feel safe to do so
- To work with staff so that they can identify different sorts of bullying and know how to deal with cases sensitively, supportively and effectively
- To work with children in a range of ways to equip them with social and emotional skills to reduce bullying and to be able to counter act and deal with bullying.

Definition of Bullying

*Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (for instance, cyber-bullying via text messages, social media or gaming, which can include the use of images and video) and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, special educational needs or disabilities, or because a child is adopted, in care or has caring responsibilities. It might be motivated by actual differences between children, or perceived differences. (*Preventing and Tackling Bullying, July 2017)

Bullying is aggressive or insulting behaviour by an individual, or a group of individuals, that intentionally sets out to hurt, harm or humiliate another person or group of individuals by physical (including sexual), verbal (including email, chat room and SMS messages), and emotional means (by excluding, tormenting or spreading malicious rumours). It can involve manipulating a third party to tease or torment someone. It can involve complicity that falls short of direct participation. Bullying is often hidden and subtle. It can also be overt and intimidatory.

Bullying may involve actions or comments that are racist, sexual, sexist or homophobic, which focus on religion, cultural background, disabilities or other physical attributes (such as hair colour or body shape). Bullying can happen anywhere and at any time and can involve everyone - pupils, other young people, staff and parents.

The hurtful behaviour may be repeated over a period of time and, if allowed to continue in the social context of a School, can become an established and accepted form of behaviour, thus making it extremely difficult for victims to defend themselves. It can take various forms:

- Physical – for example fighting, damaging or hiding someone's clothes or belongings.
- Psychological – for example, excluding someone from a group, activity or place; aggressive name-calling; cyberbullying (e.g., via social networking websites, phone calls, text messages, photographs or e-mails) or unpleasant remarks or actions related to any of the following.
  - Race, religion or culture.
  - Sex (e.g., Talking to or touching someone in a sexually inappropriate way).
  - Gender.
  - Transgender (LGBT)
  - Sexual orientation (e.g., homophobic bullying).
  - Disability.
  - Special educational needs, a disability or some other obvious difference, e.g., Stammering or acne
  - A lack of close friends in the School
  - shyness

Any behaviour which a reasonable bystander would say was calculated or intended to hurt or upset the victim, is wrong and may well constitute bullying. It is no justification that the bully says or believes that the victim is not upset or hurt by his or her actions or words. Sanctions of any kind against a pupil are the responsibility alone of staff (in conjunction with parents), and not, other pupils.

Recognising the Signs of Bullying

Bullying is deliberately harmful behaviour over a period of time. The School recognises that any pupil can be bullied, but certain factors that can make bullying more likely are:

- a lack of close friends in the School
- shyness
- race, religion, sexual orientation or social class
- special educational needs, a disability or some other obvious difference, e.g., stammering or acne.

Staff will suspect bullying is occurring if a pupil:

- becomes withdrawn and anxious
- shows a deterioration in his or her work
- starts to attend School erratically
- has spurious illnesses
- persistently arrives late at School
- prefers to stay with adults
- Unwillingness to return to School
- Books, bags and other belongings suddenly go missing or are damaged
- Change to established habits (e.g., giving up music lessons, change to accent or vocabulary)
- Diminished levels of self-confidence
- Frequent sickness with symptoms such as stomach pains, headaches etc.
- Unexplained cuts and bruises
- Choosing the company of adults
- Displaying repressed body language and poor eye contact
- Difficulty in sleeping, experiencing nightmares etc.
- Talking of suicide or running away

Although there may be other causes for some of the above symptoms, a repetition of, or a combination of these possible signs of bullying should be investigated by parents and teachers.

Preventing Bullying

We take the following preventative measures to ensure that bullying does not become a problem which is associated with Eaton House Schools:

- All new pupils (including our EYFS pupils) are briefed thoroughly on the Schools expected standards of behaviour. They are told what to do if they encounter bullying. We guarantee that whistle-blowers who act in good faith will not be penalised and will be supported.
- All new members of staff in their first week at Eaton House Schools are given guidance on the Schools anti-bullying policy and how to react to allegations of bullying. They are required to read the Schools policy as part of their induction. We use appropriate assemblies to explain the School policy on bullying. Our PSHE programme is structured to give pupils an awareness of their social and moral responsibilities as they progress through the School. The programme is structured to enforce the message about community involvement and taking care of each other.
- Other lessons, particularly TPR, English, Drama and PSHE highlight the issue of bullying & reinforce this message by teaching moral and spiritual values that show bullying to be unacceptable and by developing social skills and the importance of avoiding prejudice-based language.
- Pupils are taught age-appropriate information about grooming, internet sites containing violent or adult content, and not to share personal information and photographs.
- All our pupils are encouraged to tell a member of staff at once if they know that bullying is taking place in line with our policy on Sharing Concerns (Whistleblowing).
- All reported incidents are recorded and investigated at once. We always monitor reported incidents. Records of any incidents are kept securely on the Schools online system and senior management monitor patterns of behaviour.
- We have a strong and experienced pastoral team of Tutors, Heads of Year/Key Stage Leads, and House Masters/Mistresses and in the Girls' and the Prep School, an Assistant Head Pastoral who support the Head and are trained in handling any incidents as an immediate priority and are alert to possible signs of bullying.
- Inset sessions are held using outside experts.
- Staff are always on duty at times when pupils are not in class and patrol the School site, particularly areas where bullying might occur. They are trained to be alert to inappropriate language or behaviour.
- We reserve the right to investigate incidents that take place outside School hours, on School visits and trips and that occur in the vicinity of the School, involving our pupils.
- We encourage co-operation and discussion between teachers and parents.
- Sharing appropriate information between teachers and parents.

- We welcome feedback from parents and guardians on the effectiveness of our preventative measures.

Cyber Bullying – Preventative Measures

In addition to the preventative measures described above Eaton House Schools:

- Expects all pupils to adhere to its charter for the safe use of the internet. Certain sites are blocked by our filtering system and our IT Department monitors pupils' use.
- May impose sanctions for the misuse, or attempted misuse of the internet.
- Offers guidance on the safe use of social networking sites and cyber bullying in PSHE and ICT lessons which covers blocking, removing contacts from 'buddy lists' and sharing personal data.
- Offers guidance on keeping names, addresses, passwords, mobile phone numbers and other personal details safe.
- Mobile phones are not permitted in classrooms, public areas of the School, washing and changing areas or where they may cause annoyance to others.

The School Response to Bullying

At Eaton House Schools, we always treat bullying, including allegations of bullying, very seriously. It conflicts sharply with the Schools policy on equal opportunities, as well as with its social and moral principles. Bullying can cause psychological damage, eating disorders, self-harm and even suicide, and, whilst bullying is not a specific criminal offence, there are criminal laws which apply to harassment and threatening behaviour.

Any incidents of bullying will be taken seriously and dealt with as quickly as possible.
Staff who receive a report of a bullying incident from a pupil will:

- listen to the pupil's account of the incident
- reassure the pupil that reporting the bullying incident was the right thing to do
- make it clear to the pupil that they are not to blame for what has happened
- make a note of what the pupil says
- explain that the pupil should report any further incidents to a teacher or other member of staff immediately
- the staff member will inform the Head Teacher/Deputy Head Teacher

Staff will ask the pupil:

- what has happened
- how often it has happened
- who was involved
- where it happened
- who saw what happened
- what they have done about it already

If there are concerns that a pupil is suffering, or is likely to suffer, significant harm as a result of bullying, it will be treated as a child protection concern and reported to the local authority's social care department.

Helping Bullies to Change

Staff will spend time to help pupils who have bullied others to change their behaviour. If a pupil is bullying others, staff will:

- talk to the pupil and explain that bullying is wrong and makes others unhappy
- discuss with the pupil how to join in with others without bullying
- talk to the pupil about how things are going at School, their progress and friends
- give the pupil lots of praise and encouragement when they are being kind and considerate to others

Dealing with Serious Bullying

If the preventative measures and peer support strategies do not succeed, serious bullying will be dealt with under the Schools discipline policy. The bully will:

- be removed from the group
- lose any break or lunchtime privileges
- have any item that might have been used for cyberbullying confiscated
- be put in detention
- be banned from a School trip or sports event where these are not an essential part of the curriculum
- be excluded or suspended for a fixed period

In the most serious cases, permanent expulsion will be the most likely sanction if the bullying:

- involves serious actual or threatened violence against another pupil
- amounts to persistent and defiant misbehaviour

Procedures for Dealing with Reported Bullying

If an incident of bullying is reported, the following procedures are adopted:

- The member of staff to whom it was reported, or who first discovers the situation, will control the situation, reassure and support the pupils involved.
- He/she will inform the Head Teacher as soon as possible.
- The member of staff will calmly explain the range of disciplinary measures that are potentially involved.
- The victim will be interviewed on his/her own and asked to write an account of events, age appropriate.
- The bully, together with all others who were involved, will be interviewed individually and asked to write an immediate account of events.
- The incident should be recorded on a School incident form and signed and dated before it is given to the Head who is responsible for keeping all records of bullying and other serious disciplinary offences, securely in a locked cabinet in his/her office.
- The Head will inform the form teachers/tutors and House Master/Mistresses of both the bully/bullies and the victim[s] as soon as possible.
- The victim will be interviewed at a later stage by a member of the pastoral team separately from the alleged perpetrator. It will be made clear to him/her why revenge is inappropriate. He/she will be offered support to develop a strategy to help him or herself.
- The alleged bully will be interviewed at a later stage by a member of the pastoral team, separately from the victim, and it will be made clear why his/her behaviour was inappropriate and caused distress. He/she will be offered guidance on modifying his or her behaviour, together with any appropriate disciplinary sanctions as set out in the Schools Behaviour Management Policy, for example, detention, withdrawal of privileges or suspension. In particularly serious and/or persistent cases, the bully should expect permanent exclusion.
- The parents/guardians of all parties should be informed and invited into School to discuss the matter. Their support should be sought. Please note where a pupil has been accused of bullying/harming others, his/her parents should always be informed of the allegation (although it is unlikely to be appropriate to disclose who has raised the accusations).
- A way forward, including disciplinary sanctions and counselling, should be agreed.

This should recognise that suitable support is needed both for children who are being bullied and for pupils who bully others, as well as dealing with appropriate disciplinary measures in accordance with the Schools Behaviour Management Policy.

- A meeting involving all the parties, with close staff supervision, could be helpful in developing a strategy for all concerned to close the episode.
- A monitoring and review strategy will be put in place.
- In very serious cases, and only after the Headmaster/Mistress has been involved, it may be necessary to make a report to the Police or to the Social Services. However, it is the policy of Eaton House Schools to attempt to resolve such issues internally under the Schools own disciplinary procedures, unless the matter is of such gravity that a criminal prosecution is likely. The School may exclude a pupil, either temporarily or permanently, in cases of severe and persistent bullying and in the event that the support put in place for the bully does not result in the modification of behaviour to an acceptable level.
- If there are concerns that a pupil is suffering, or is likely to suffer, significant harm as a result of bullying, it should be treated as a child protection concern and reported to the local authority's social care department.

Bullying of pupils with Special Education Needs

Children with special educational needs (SEND) can have particular difficulties in relation to bullying. For example, that they may find it difficult to recall events, they may not realise what is happening to them, and their behaviour may mean that Schools are less likely to believe their accounts. They are also at greater risk of suffering bullying. This risk needs to be addressed with a mixture of preventative and responsive work.

There are several tools that can be developed to counter prejudice and foster a positive ethos:

- ensure that pupils with SEND are fully integrated into the life of the School
- ensure that all staff are aware of pupils who are vulnerable and understand their particular needs
- ensure that staff training covers the specific ways in which bullying affects pupils with SEND
- use the curriculum to explore the issue of "difference" and give pupils the opportunity to explain to their peers what it is like to have their special needs or disability
- encourage a positive relationship with the parents of pupils with SEND
- assess any trends or patterns in incidents of bullying affecting this group of pupils
- have a robust and consistent whole-School approach to bullying
- Staff are aware that if children are behaving in a particular way or they are looking distressed or behaviour or demeanour is different that it may not be due to their SEN or disability and it could potentially be that bullying is taking place

Recording Incidents

All incidents of bullying and discussions with the pupils involved will be recorded, along with the Schools response.

Co-operating with Parents and Carers

The School will ensure that parents are aware of the Schools anti-bullying policy.

The School will encourage parents who suspect that a child is bullying or being bullied to immediately contact the School and make an appointment to see the child's teacher or form tutor as soon as possible. The Head Teacher and Deputy Head Teacher must be kept informed of all incidents and are involved in the processes.

Parents and carers will be informed of incidents and involved in discussions. The School will discuss with parents how they can work together to stop the bullying.

We work closely with parents/carers to ensure that there is a consistent approach in preventing bullying.

Monitoring and Review

This policy is regularly monitored by the Senior Management Team to ensure that it is working as effectively as possible. The policy is also monitored and reviewed annually by the Governors.

Cyber Bullying - Definition

It is important that staff, pupils and parents are educated to understand what cyberbullying is and what its consequences can be, and that we have effective measures in place to deal effectively with cases of cyberbullying. We must ensure that we monitor the effectiveness of prevention measures. To be aware and understand the use of different technologies to tease, bully or threaten.

Cyberbullying is defined as the use of information and communications technology to deliberately upset someone else.

Cyberbullying can involve Social Networking Sites, like Bebo, Facebook, Myspace, Instagram, emails and mobile phones used for SMS messages and as cameras. It can change as quickly as the available technology does.

It can be used to carry out all the different types of bullying. It can also go further in that it can invade home/personal space and can involve a greater number of people. It can take place across age groups and School staff and other adults can be targeted. It can draw bystanders into being accessories. It is difficult to eliminate for e.g., pictures placed on the internet.

Cyberbullying can take the forms of, threats, sexting (when young people, either voluntarily or under duress, exchange or forward sexual images of themselves or others. Most of the participants are unaware that sending such images is usually a criminal offence, intimidation, harassment or cyberstalking (where, for example, unwanted messages or texts are sent repeatedly), unauthorised publication of private information or images.

There is a strong link between cyberbullying and sexualised communication or sexual harassment. The pressure to participate, particularly for girls, can be strong and can manifest itself as bullying.

Homophobic Bullying

Homophobic bullying refers to young people who are, or may be, lesbian, gay, bisexual, transgender or who have friends and family who are. It can be particularly difficult to deal with as the victim may not wish to tell anyone. Studies have found that three out of five gay pupils never tell anyone when they are being bullied.

Homophobic bullying and the use of derogatory language is not tolerated in the School and will be dealt with if it does occur. Prevention measures are always better to prevent any form of bullying.

Racist Bullying

Racist bullying targets a person's family and culture as well as their personal characteristics, resulting in wider feelings of hurt on the part of the victim. It can be seen to be sanctioned by a wide group of people, leading the victim to assume that others in the same cultural group share the same opinions and cannot, therefore, be trusted.

The ethos of the School is vital in combating racist bullying. Pupils must feel secure about reporting incidents and that their reports will be dealt with effectively.

Six themes can be used in every curriculum subject to help tackle some of the underlying beliefs that fuel racism:

- shared humanity: similarity, sameness and universality
- difference and diversity: contrasting stories and interpretations
- interdependence: borrowing, mingling and mutual influence
- excellence everywhere
- identity and belonging
- race, ethnicity and justice.

In dealing with instances of racism, perpetrators should be helped to understand their own behaviour and how they might change it. It should be recognised that for younger pupils in particular, racist actions and language may be part of the home environment.

Sanctions

For all incidents of bullying, disciplinary sanctions will normally be applied, and this may extend to suspension, required removal or - in the gravest cases of severe or persistent bullying - expulsion.

EYFS Children

Even the youngest children are encouraged to behave towards each other with kindness and consideration. They must learn to look after their own possessions and to respect other's possessions. We expect them to be honest, helpful and polite, and to work hard and to listen to others. They should respect everyone and learn to value differences and diversity. All Head Teachers with EYFS children within their Schools, are in day-to-day charge of the management of behaviour in the EYFS classes.

We explain to children why some forms of behaviour are unacceptable and hurtful to others. We rarely need to impose sanctions but sometimes we may remove a treat for hurtful behaviour. Parents are always informed via a note in the homework diary when any sanction or reproof is needed and, in cases of repeated instances of hurtful or inappropriate behaviour, they will be invited into the School to discuss the situation with their child's Teacher and the Head Teacher and to agree a joint way of handling the difficulty.

Complaints Procedure

Parents and pupils are encouraged to use our complaints procedure (which is published on our website) if they feel that their concerns about bullying (or anything else) are not being addressed properly. Parents of EYFS children should be aware that they have the right to refer a complaint directly to Ofsted if they are unhappy with the way in which their complaint has been handled. The complaints policy explains how to complain to Ofsted.

Training

All Schools should provide training for teaching and support staff on the implementation of the School behaviour management and bullying policies. Only through regular training can a consistent whole School approach be achieved in both behaviour management and in applying strategies to combat bullying.

Training programmes should aim to embed the following skills:

- How to identify the root causes of challenging behaviour
- How to recognise low-level signs of distress and anger
- How to communicate effectively and engage with young people
- How to negotiate with young people and their parents or carers
- How to work with external agencies and in multi-agency relationships
- How to demonstrate high-quality and effective classroom practice, teaching and pupil behaviour management

Eaton House School staff complete training in Online Safety and Anti-Bullying Awareness.

Linked Policies

Safeguarding and Child Protection Policy

Pupil Behaviour, Discipline and Exclusions Policy

Complaints Policy

Cyberbullying Policy

Acceptable ICT Usage Policy

Incident and Action Record

Date:	Staff Reporting:
Name:	Form:

Names of those involved:

Description of Incident:

Action taken:

EATON HOUSE THE MANOR (NURSERY)

BEHAVIOUR, DISCIPLINE
&
EXCLUSIONS POLICY

Contents

Aims

- To develop a whole School behaviour policy supported and followed by the whole School Community, parents, teachers and children, based on a sense of community and shared values.

- By applying positive policies, we aim to create a caring, family atmosphere in which teaching and learning can take place in a safe and nurturing environment.

- To teach, through the Early Years curriculum, values and attitudes as well as knowledge and skills. This will promote responsible behaviour, encourage self-discipline and encourage in children a respect for themselves, for other people and for property.

- To encourage positive behaviour rather than to simply punish negative behaviour by providing a range of rewards for children of all ages and abilities.

- To make clear to children the distinction between minor and more serious misbehaviour and the range of sanctions that will follow.

- To treat problems when they occur in a caring and sympathetic manner in the hope of achieving an improvement in behaviour.

Corporal Punishment

It is strictly forbidden for anyone on School premises to use corporal punishment and guidance is given through this policy on the circumstances in which physical intervention is allowable.

It is strictly forbidden to threaten corporal punishment or use or threaten any form of punishment which could have an adverse impact on the child's well-being.

Positive Behaviour

A major aim of the School policy is to encourage children to practice positive behaviour by operating a system of understanding and a holistic view of the child, this goes beyond praise and reward. Verbal and and non verbal praise are given as often as possible by all teachers to all children.

Eaton House The Manor Nursery Positive Behaviour Procedure is based on specific verbal praise, non-verbal praise (high fives, fist bumps, sparkly claps) stickers, stamps, stars, along with special responsibilities through which children can be rewarded for special efforts including being caring, and for all aspects of play and behaviour.

Most children respond to this positive approach where their efforts are seen to be valued and make considerable efforts to improve their behaviour/work where necessary.

Parents are encouraged to complete a WOW observation which recognises significant achievements outside of School.

British Values are part of our nursery ethos and embedded in the EYFS. We encourage children to share stories of their home that reflect the **values** and the diversity of their experiences. Resources and activities are provided that challenge gender, cultural and racial stereotyping.

Sanctions

There will be times when children display challenging behaviour. Children need support to discover how to manage their behaviour.

Minor challenges are generally dealt with by the class teacher in a caring, supportive and fair manner, there should be flexibility regarding age and stage of the child.

Each case is treated individually, children are unique and should be treated as such.

Normal approaches include an individual and group discussion and a reminder of expected behaviour and classroom promises. There is a calm corner for self soothing opportunities. The emotion coaching approach is regarded as effective.

Parents are always kept informed of their child's behaviour via informal meetings with teachers, or, where necessary, formal meetings.

The Headmistress and Behaviour Co-ordinator will be fully informed.

Procedures for dealing with Minor Breaches of Discipline

At all times staff should encourage positive behaviour through understanding. No member of staff must in any way physically chastise a child.

If there is a need for sanctions then the following may be used, depending on each child's needs.

Early Years strategies:

- Child led class rules and promises

- Colour Monster book, props, visual charts and lanyards, to reinforce meaning of emotions

- Name it to tame it, name emotions in the moment

- De-escalation strategies used, such as a calm quiet voice, adult to meet the child where they are, sit down next to child, be with the child in the moment, remind then they are safe

- Circle time to discuss behaviour and emotions

- Consider fight flight and freeze in child

- Discuss and role play during circle time or small group work

- Use star charts as an alternative for individual children

- Recognition and praise should be specific

- Opportunities to sit in the calm corner, time in, not time out

- Encourage positive relationships with parents and parents as partners for a holistic approach

Staff are expected to report and record concerning behaviour in our Children of note item during staff meetings.

Procedures for Dealing with Major Breaches of Discipline

- A meeting with the parents to discuss the next steps, unless there is an improvement in the child's behaviour.

- If the problem is severe or recurring, then an agreed decision is to be made by the School and the parents.

A very serious situation may result in the normal procedure being abandoned and a child being taken home straight away. This is to keep the child safe, all other children safe and the teachers safe.

Parents

Parents can help:

- By recognising that an effective School behaviour policy requires close partnership between parents, teachers and children

- By discussing the class rules and promises with their child, emphasising their support of them and assisting when possible with their enforcement

- By attending Parent's Evenings, parents' functions and by developing informal contacts with the School

- By knowing that learning and teaching cannot take place without sound boundaries and expectations in place

- By remembering that staff deal with behaviour problems patiently and positively

6

Eaton House the Manor Nursery School – Pupil Behaviour,   Updated RS Sept 2024
Discipline & Exclusions Policy   Review RS Sept 2025

Intervention which Requires Physical Restraint

If a child violently attacks another child or adult and does not respond to any of the approaches stated above, then physical restraint is necessary.

The child should be removed from the situation as soon as possible and taken to the Headmistress who will take immediate action to involve parents.

The incident **should** be documented.

The Headmistress will work with the member of staff and parents to devise an action plan to meet that child's needs. This may include the involvement of other agencies – the School SENCO or social services.

7

Eaton House the Manor Nursery School – Pupil Behaviour,   Updated RS Sept 2024
Discipline & Exclusions Policy   Review RS Sept 2025

Behaviour Modification Policy

There are occasions when individual children exhibit behaviour which is challenging. As part of the approach within our discipline policy, we use behaviour modification strategies to change individual children's behaviour. These are used by all staff.

Each child is unique, so it is important that the cause of the behaviour is investigated and plans are set in place to meet the child's individual needs.

Other strategies might include:

- Change in classroom organisation

- Using different resources, visual prompts and individual timetables

- In some cases, smaller steps are devised for an individual

- Social story

- Individual calm corner or tent

- Read behaviour story books

- Responsibility – such as a 'special' job

- Involving parents at an early stage to make an action plan together

Miss Roosha is the nursery Behaviour Co-ordinator.

Linked Policy

Equality of Opportunity Policy

EATON HOUSE THE MANOR (GIRLS')

BEHAVIOUR, DISCIPLINE
&
EXCLUSIONS POLICY

Contents

Aims

- To develop a whole School behaviour policy supported and followed by the whole School community; parents, teachers, and children.

- By applying positive policies, we aim to create a caring, family atmosphere in which teaching and learning can take place in a safe and happy environment.

- To teach, through the School curriculum, values, and attitudes as well as knowledge and skills. This will promote responsible behaviour, encourage self-discipline, and encourage in children a respect for themselves, for other people, for property and for their environment.

- To encourage good behaviour rather than to simply punish bad behaviour by providing a range of rewards for children of all ages and abilities.

- To make clear to children the distinction between minor and more serious misbehaviour and the range of sanctions that will follow.

- To treat problems when they occur in a caring and sympathetic manner in the hope of achieving an improvement in behaviour.

- This policy applies to all pupils at Eaton House The Manor Girls' School, including those in the EYFS.

School Rules

These School rules have been formulated with the safety and well-being of the children in mind, and to enable the School to function efficiently as a place of learning. They have been written in consultation with all members of teaching staff and are regularly reviewed. The rules are displayed clearly around the School.

1. Be Kind
    - ➢ Always tell the truth
    - ➢ Say sorry if you upset someone
    - ➢ Think about other people's feelings
    - ➢ Treat others as you would want to be treated

2. Be Respectful
    - ➢ Remember to say please and thank you
    - ➢ Hold doors open for teachers and visitors
    - ➢ Arrive on time for School and lessons
    - ➢ Remember to be polite at lunch
    - ➢ Look after your own and other people's belongings

3. Be Sensible
    - ➢ Line up quietly
    - ➢ Walk carefully in the corridors
    - ➢ Make sure a teacher knows where you are at all times

4. Be Smart
    - ➢ Wear your blazer and hat to and from School
    - ➢ Tie long hair back neatly with either a green or red hair tie
    - ➢ Do not wear jewellery or nail varnish (earrings should only be simple studs)

Positive Discipline

A major aim of the School policy is to encourage children to practice good behaviour by operating a system of praise and reward. Verbal and written praise are given as often as possible by all teachers to all children.

The system is based on Good Shows, Merits, Courtesy stickers, and House points through which children can be rewarded for academic and non-academic achievements, for effort and for being caring, and for all aspects of good work and behaviour.

All children are placed into one of four Houses, with siblings generally remaining in the same House. Children are awarded House points for thoughtfulness, being helpful, good work etc. Each House's points are counted at the end of the week, and a running total announced in assembly. At the end of each term a cup is presented to the House with the most points. Good shows (5HPs) are awarded by the Head/Deputy Head to pupils who have demonstrated excellent work. The Head sees pupils on teacher's recommendations. Any pupil who has received a Good Show has her name announced in assembly. Courtesy (5HPs) are awarded in an equivalent way. Merit stickers (3HPs), generally for demonstrating sustained effort in a particular area are awarded by the housemistresses. We hope that the senior children will encourage members of their House to try their best in every aspect of School life.

Housemistresses/masters also play a vital role in positive discipline. Pupils will take good work to them and are often rewarded for accumulating a certain number of House points. In Sport and The Arts achievement is praised and publicly rewarded through the awarding of School Colours at the end of term prize-giving ceremony.

At the end of each term there is Prize Giving. Prizes are awarded for effort and achievement. There is a wide range of cups and awards for academic and non-academic areas as well as colours, mainly for senior girls F4-6.

Children are also encouraged to share their out-of-School achievements in assemblies, and their work is displayed on boards throughout the School.

Most children respond to this positive approach where their efforts are seen to be valued, and make considerable efforts to improve their work, and, where necessary, their behaviour.

Sanctions

Sadly, there will be times when children are badly behaved. Children need to discover where the bounds of acceptable behaviour lie, as this is a part of growing up.

Minor breaches of discipline are generally dealt with by the Form teacher in a caring, supportive, and fair manner, with some flexibility regarding age of the child as far as sanctions are concerned.

Each case is treated individually. Children are made aware that they are responsible for their own actions and that breaking rules will lead to consequences.

Normal sanctions include a verbal reprimand and reminder of expected behaviour, loss of free time such as playtimes (though not for more than half of the allocated time), moving to sit alone, sending work home, letters of apology, loss of responsibility and removal of House points. If a pupil loses five House points within a week they are automatically placed in a Stay (Lunchtime detention for Juniors) or Detention (after School detention for Seniors). Stays/detentions will also be given if a pupil is seen to be in serious breach of School Rules. In every case, the Head will contact the parents to inform them of their daughter's Stay/Detention, but also to discuss the pupil's behaviour and to address it.

Parents are always kept informed of their daughter's behaviour via informal meetings with teachers, emails, and where necessary, formal meetings. If problems are persistent or recurring, children may then be placed on a daily or weekly report system to monitor their behaviour with parents' support.

Major breaches of discipline include physical assault, deliberate damage to property, stealing, leaving the School premises without permission, verbal abuse, refusal to work and severely disruptive behaviour in class.

This type of behaviour is generally rare, and it is the responsibility of the Head to follow the appropriate procedures.

Procedures for dealing with Minor Breaches of Discipline

At all times staff should encourage good behaviour through praise and rewards. No member of staff must in any way physically chastise a child.

If there is a need for sanctions then the following may be used, depending on the context and each child's needs:

- Redirect to another activity

- Talk to the child – discuss what has happened

- Discussion in groups or whole class

- Move the child from the group to work on her own

- Repeat work

- Miss part of playtime/Break

- Remove child from the class – send to Housemistress, Deputy Head or Head.

- Parental involvement

- Daily report or weekly report

If the incident is of a more serious nature, the details should always be shared with the Deputy Head/Behaviour Co-ordinator who will inform the Head if deemed necessary.

Procedures for Dealing with Major Breaches of Discipline

- A verbal warning by the Deputy Head or Head with expectations as to future conduct clarified; parents informed; appropriate sanctions given (eg Detention or daily report)

- A meeting with parents, and a warning given about the next stage unless there is an improvement in the child's behaviour

- If the pupil continues to persist in serious misbehaviour, the flow diagrams in Appendix 1 and Appendix 2 provide examples of the processes that may be adopted.

NB A profoundly severe problem may result in the normal procedure being abandoned and a child being taken home straight away.

Parents

Parents can help:

- By recognising that an effective School behaviour policy requires close partnership between parents, teachers, and children

- By discussing the School rules with their child, emphasising their support of them, and assisting, when possible, with their enforcement

- By attending Parents' Evenings, parents' functions and by developing informal contacts with School

- By knowing that learning and teaching cannot take place without sound discipline

- By remembering that staff deal with behaviour problems patiently and positively

Intervention which Requires Physical Restraint

If a child violently attacks another child or adult and does not respond to requests to stop, then physical restraint is necessary.

The child should be removed from the situation as soon as possible and taken to the Head who will take immediate action to involve parents.

The incident should be documented.

The Head will work with the member of staff and parents to devise an action plan to meet that child's needs. This may include the involvement of other agencies – social services, psychological services etc.

Corporal punishment is unlawful in all circumstances. The School Standards and Framework Act 1998 states that the corporal punishment of a child cannot be justified by virtue of the position of a teacher or any other person who has lawful control or charge of a child being *in loco parentis***, ie in the place of the parent.**
The ban on corporal punishment applies to all Schools. Corporal punishment is defined as doing anything to a child, for the purpose of punishment, which would constitute battery.

However, anything done to avert an immediate danger of personal injury or damage to property would not be considered to be corporal punishment.

Behaviour Modification and Support Systems

At Eaton House The Manor Girls' School, most of the children are very well behaved. There are, however, occasions when individual children exhibit behaviour which is unacceptable. As part of the approach within our discipline policy of rewards and sanctions we use behaviour modification strategies to change individual children's behaviour. These are used by all staff.

Each child is different, so it is important that the cause of the behaviour is investigated, and plans made to meet individual needs.

A wide range of rewards are used to reinforce positive behaviour and tackle negative behaviour. These can include:

- Change in classroom organisation

- Using different resources

- Star Charts

- Differentiated work and tasks

- Rewards of House points

- Use of certificates

- Sharing good behaviour with other children/other classes

- Good Shows and Merit Badges announced in assembly

- Meetings with staff to discuss consequences of choices

- Involving parents at an early stage to make an action plan together

Individualised support systems such as those outlined above, will be organised by the Form Teacher, Housemistress/master, or member of the SMT, as deemed most appropriate for the child.

Particular attention, from Form teachers and House staff is paid to any vulnerable children (such as those experiencing family break ups or bereavement). This would involve informal daily meetings and would reflect the particular needs and age of the child.

Suspension

Suspension from School will be as a direct result of multiple significant breaches of discipline or, in some cases, will be as a direct result of one major breach of discipline. Before suspension is reached a pupil will normally have gone through various stages of the discipline policy. If the pupil continues to persist in serious misbehaviour, the flow diagrams in Appendix 1 and Appendix 2 provide examples of the processes that may be adopted.

Appendix 1

Head Teacher has a series of meetings

Class Teachers/form tutors

Housemaster/Mistresses

Senior Management Team

Parents are kept informed throughout the process if not fully involved in the meetings themselves.

During meetings clear objectives and directives are issued, minuted and communicated to the pupil.

Decision reached to suspend pupil

Head Teacher to meet with parents and go through reasons for suspension

Pupil is then invited to join the meeting to provide opportunity to go over points and to provide parents opportunity to discuss matter with their child.

Head Teacher sets suspension period

Specifications made during the suspension period must be complied with such as behavioural contracts, visiting specialists or having some form of counselling.

End of Suspension period the pupil and parents meet with Head Teacher to discuss their return to school and class/form tutors informed

Appendix 2

Following return from suspension pupil continues to behave in an unacceptable manner

Repeat Suspension	Permanent Exclusions
Follow Appendix 1 procedure	Parents informed of incident
	Parents meet Head and cause of expulsion made clear. Parents given chance to respond and queries are addressed.
	Pupil joins meeting and causes for their expulsion is made clear.
	Pupil asked to leave the premises.
	Eaton House School will assist in the transfer of pupil to another school through report writing and advice.
	All records of meetings kept on pupil's file.

Linked Policies

Equality of Opportunity Policy

Anti-Bullying Policy

Cyber-Bullying Policy

Pupil Behaviour, Discipline and Exclusions Policy Pre-Prep

Contents

Aims of Eaton House Schools

- To provide an academically rigorous and broad education that encourages pupils to achieve the very best in all they do and develop knowledgeable and reflective young people.

- To nurture each child's gifts and talents, enabling them to access a wide range of future opportunities to care for every child, ensuring they feel noticed and known, placing their wellbeing at the heart of everything we do and developing compassionate and empathetic individuals.

- To embed a culture that promotes a love of learning, where every child develops the confidence to embrace new experiences, learn from mistakes and take measured risks.

- To have a vibrant and inclusive community, where pupils, parents and staff enjoy close and supportive relationships and have a sense of belonging and shared purpose.

Aims of this policy

This policy applies all pupils in the Pre-Prep.

- To encourage pupils to develop good behaviour through participation in processes of positive reinforcement by providing a range of rewards for pupils of all ages and abilities.

- To promote a consistent approach to behaviour which is supported and followed by the entire community: children, parents and teachers.

- To cultivate a caring, family atmosphere, and a safe and happy environment in which teaching and learning occurs.

- To manage behaviour in an understanding and considerate manner in the hope of achieving sustainable progress with individual pupils and the school community.

- To consider the various contributory factors – personal and educational – that may cause a pupil to have difficulty in managing his own behaviour.

- To ensure all pupils are treated with dignity and respect in relation to their behaviour, in the hope of positive change, and a growth mindset.

- To teach, through the curriculum, values and attitudes that promote responsible behaviour, encourage self-discipline and pupils' respect for themselves, for other people and for property.

- To ensure pupils understand the distinction between less serious and more serious misbehaviour, and the range of sanctions that will follow.

Responsibilities

- The Head has overall responsibility for the Pupil Behaviour, Discipline and Exclusions Policy and its implementation.

- The Deputy Head has day-to-day oversight and management of Pre-Prep behaviour processes.

- The Pre-Prep Behaviour Champion supports staff in the consistent application of the behaviour policy and its practical development.

- Heads of Houses and Year Coordinators support the Sanctions Plan in addition to demonstrating strong and positive pastoral leadership in their respective Houses or year groups.

- Teaching staff implement the provisions of the Pupil Behaviour, Discipline and Exclusions Policy on a daily basis.

Eaton House Values

The management of all pupil behaviour is with due regard to the Eaton House Values, which were formulated with the character development and wellbeing of pupils in mind, enabling the school to function effectively as a place of learning. The Eaton House Values were developed in consultation with all members of staff at Eaton House Schools. They are displayed throughout the school and they are referred to frequently as the foundations of the school's common life.

In addition to the Eaton House Values, classroom rules may be introduced by Class Teachers, often with pupil input.

The House system

The House system is designed to support effective pastoral care and behaviour management in the school. Pupils are placed in a House upon entry to the school and remain in that House for the duration of their school career; siblings are placed in the same House.

- **Heads of House** are members of staff who agree to undertake this responsibility. They lead house assemblies and support Class Teachers in the pastoral care and behaviour management of pupils in their Houses.

- **House Captains** are appointed to each House at the beginning of every autumn term from pupils in Year 3. They are expected to be mature role models for their respective House and the rest of the school.

Arundel
Balmoral
Stirling
Windsor

The aims of the House system are:

- To support effective pastoral care and behaviour management in the school;

- To provide pupils with the opportunity to belong to a supportive and cross-year team;

- To allow pupils to enjoy friendly competitive activities as part of a team, and to earn points for their team: 'House Points';

- To provide the boys with strong adult role models – the Head of House and House staff – and pastoral care.

- To provide a catalyst for social cohesion within the school.

The importance of the corporate nature of the House system is emphasised to the boys regularly. They are encouraged to work together in order to enable their House to succeed. House assemblies occur fortnightly.

The House system (cntd)

At the start of each academic year, every pupil is provided with a Bronze House Point certificate, upon which he affixes any House Points awarded. Upon its completion, the pupil gives the certificate to the Head or, in the Head's absence, the Deputy Head, so that the pupil may be provided with the next level of certificate and so that the completed certificate may be presented to the pupil publicly at the next whole-school assembly.

This process is repeated through each of the levels of certificate outlined below.

Certificate level	Number of House Points required to complete certificate
Bronze	50
Silver	
Gold	
Ruby	
Emerald	
Diamond	
Titanium	
Chromium	
Tungsten	100

At the end of each term, the boy in each House who has been awarded the most House Points is awarded a prize at the termly prize-giving ceremony.

Positive reinforcement

A central aim of this policy is to encourage pupils to develop good behaviour through participation in processes of positive reinforcement. In the Pre-Prep, positive behaviour management strategies culminate in the awarding of **House Points**, **Merits**, **Good Shows** and **High-Five Awards** for academic and non-academic achievements, for effort, for being caring, and for all aspects of good work and behaviour that demonstrate one or more of the Eaton House Values.

- **House Points** are awarded for effort, strong work, impressive behaviour and pleasing demonstration of the Eaton House Values, which may include extra-curricular activities or out-of-school pursuits. Class Teachers receive an email reminder every Thursday to submit class house totals via an online form. Weekly results are announced during Monday's assembly, with the House Captains of the winning House being awarded the House Bear.

- **Merits**, worth **five** House Points each, are awarded for excellent effort, work or strong behaviour, and consistent demonstration of the Eaton House Values.

- **Good Shows**, worth **ten** House Points each are awarded by the Head to pupils who have demonstrated exceptional work. The Head sees pupils on teachers' recommendations.

- **High-Five Awards** are awarded by the Deputy Head to pupils who have upheld one of the Eaton House Values (below) to an exceptional degree. The Deputy Head sees pupils on teachers' recommendations.

Categories of behaviour

The school operates a three-tier ratings scale – green, yellow, red – for categorising behaviour. A non-exhaustive list of behaviours that would fall into each category may be found below.

Green behaviours – 'Green to Go' (Ready to Learn)	
• Demonstrating the Eaton House Values	• Taking turns
• Good listening	• Keeping safe
• Good sitting	• Following instructions
• Thinking carefully	• Sensible lining up / walking
• Sharing	• Using equipment with care

Yellow behaviours – Minor / Occasional Breaches of Discipline	
• Interrupting or distracting others	• Upsetting others
• Calling out	• Unkind language
• Answering back / mild rudeness	• Selfish 'mean' behaviour
• Not listening to or following instructions	• Low responsibility for belongings and / or kit (Year 2 and Year 3 only)
• Excessively physical play – 'rough play'	

Red behaviours – Major Breaches of Discipline
• Persistence in yellow behaviours, after three warnings
• Stealing
• Damage to school property
• Severe physical violence
• Swearing or using threatening language towards pupils and / or adults
• Words or acts of discrimination towards others

Sanctions

During the school day, in the context of positive reinforcement of desired behaviours, there may be times when pupils do not demonstrate right behaviours or uphold the Eaton House Values. Negative behaviours are expected to be challenged firmly and consistently by staff throughout the school. Pupils are taught to understand that falling short of the Eaton House Values leads to a sanction.

Staff should, whenever possible, challenge and resolve disappointing behaviour themselves in the first instance. If they consider that further action needs to be taken, they may escalate the response to the next stage in the behaviour management process (see below).

Minor / occasional breaches of discipline (yellow behaviours, above) are generally addressed by the Teacher in charge in a caring, supportive and fair manner, with consideration of the age and understanding of the pupil in relation to any sanctions applied. Each case is treated individually and considered in context.

Major breaches of discipline (red behaviours, above) include severe physical or verbal violence towards an adult or a pupil, deliberate damage to property, stealing, leaving the school premises without permission, verbal abuse, persistent refusal to work and seriously disruptive behaviour in class.

When a teacher imposes a sanction on a pupil, the pupil is reminded that he is responsible for his own actions and choices. Pupils are expected to understand the difference between right and wrong with increasing sophistication as they mature, supported by guidance from teaching staff, assemblies and the PSHE curriculum. If a teacher is involved in disciplining a pupil who is not a member of his or her class, he or she is expected to inform the pupil's Class Teacher at the earliest opportunity.

Careful consideration is given to vulnerable pupils, for example pupils who may be experiencing disruption at home or bereavement, when Class Teachers, Heads of Houses, the Deputy Head or the Head, evaluate appropriate sanctions for such pupils.

Removal of House Points

A single House Point may be removed from a pupils' certificate after one verbal warning has been given to a pupil concerning his behaviour. If the pupil persists in the misbehaviour, then the pupil will be asked to provide his House Point certificate to the teacher, so that the House Point may be removed. Subsequent House Points may be removed through complete repetition of this process.

Sanctions plan

A consistent, fair and graduated scheme of sanctions is detailed below; all staff are expected to fulfil their responsibilities outlined in the sanctions plan, below. This plan is founded on the 'Categories of Behaviour' (p9), and it outlines the use of proportionate, escalating sanctions for behaviour that persistently fails to uphold the Eaton House Values. The school reserves the right to omit certain elements of the plan, should a boy's misbehaviour warrant it.

Class Teacher	Any of the following behaviour management strategies / sanctions may be applied: • Loss of a House Point and referral to Head of House or Year Coordinator for pupil to explain behaviour; • If appropriate, and only after a clear verbal warning each time, exclude pupil from up to three break times for a maximum of ten minutes each time; • Class Teacher inform pupil's parents, and may offer to meet with them, as appropriate.
Head of House / Year Coordinator	Any of the following behaviour management strategies / sanctions may be applied: • Informal behaviour accountability at beginning and end of each day with Head of House or Year Coordinator; • Arrange for pupil to work in isolation from peers at certain times, as appropriate.
Deputy Head	Any of the following behaviour management strategies / sanctions may be applied: • Include pupil's name on staff meeting agenda, so that all staff may be made aware of the behavioural issue(s), possible cause(s) and the action(s) taken. • Deputy Head records incident on CPOMS, an online pastoral tracking system, if appropriate. • Deputy Head informs pupil's parents, and offers to meet with them, with Class Teacher present. Any of the following behaviour management strategies / sanctions may be applied: • Time for reflection: pupil sits with Deputy Head during break time and writes about how he can improve his behaviour; a reflection sheet may be sent home (see Appendix 3); • A 'Stay' – lunchtime detention; • Behaviour record: pupil sets targets and opportunities for community service; • A **Behaviour Support Plan** may be implemented, in collaboration with the Class Teacher and Learning Enrichment Department, should it be of benefit to supporting the pupil; • Internal exclusion, as appropriate, up to maximum of two days.
Head	Any of the following behaviour management strategies / sanctions may be applied: • Deputy Head records any ongoing incidents on CPOMS; • Head informs pupil's parents, and offers to meet with them, with Deputy Head present. External suspension or exclusion, at discretion of Head, in communication with parents (see Appendix 1 and Appendix 2).

Behaviour support plans

The school recognises that 'some behaviours are more likely to be associated with particular types of SEND…Behaviour will often need to be considered in relation to a pupil's SEND, although it does not follow that every incident of misbehaviour will be connected to their SEND.' (*Supporting Behaviour in Schools*, Department for Education, September 2022, p14)

A **Behaviour Support Plan** may be formulated by the school, in consultation with a pupil's parents or carers, to manage a pupil's behaviours, proactively wherever possible, that are likely to be associated with particular types of SEND: 'schools should, as far as possible, anticipate likely triggers of misbehaviour and put in place support to prevent these.' (*Supporting Behaviour in Schools*, Department for Education, September 2022, p15)

Physical restraint

If a pupil violently attacks another pupil or adult and he does not respond to verbal requests to calm down, then exercising physical restraint may be necessary.

The pupil behaving violently is to be restrained and removed from the situation as soon as possible for his and others' safety and taken to the Head or the Deputy Head in his or her absence, who will take immediate action to communicate with the boy's parents.

The incident that required physical intervention on the part of an adult is to be recorded immediately.

The Head will work with staff and parents to devise an action plan to meet that pupil's needs and to prevent recurrence. This may include the involvement of other agencies: social services, psychological experts, etc.

Corporal punishment is unlawful in all circumstances. The School Standards and Framework Act 1998 states that the corporal punishment of a child cannot be justified by virtue of the position of a teacher or any other person who has lawful control or charge of a child being *in loco parentis***, i.e. in the place of the parent.**

The ban on corporal punishment applies to all schools. Corporal punishment is defined as doing anything to a child, for the purpose of punishment, which would constitute battery.

However, anything done to avert an immediate danger of personal injury or damage to property would not be considered to be corporal punishment.

Suspension and permanent exclusion

Suspension and / or Permanent Exclusion from the school will be as a direct result of several acts of poor behaviour or, in some cases, will be as a direct result of one major act of misbehaviour.

Before a decision to suspend or permanently exclude a pupil is reached, a pupil will usually have engaged with the various processes outlined in this policy.

If the pupil continues to persist in serious misbehaviour, the procedures outlined in Appendix 1 and Appendix 2 provide examples of the processes that may be adopted.

Appendix 1 – suspension procedure

Head has a series of meetings:

Class Teachers	Head of House	Senior Leadership Team

Parents are kept informed throughout the process if not fully involved in the meetings themselves

During meetings, clear objectives and directives are issued, minuted and communicated to the pupil

Decision reached to suspend pupil

Head to meet with parents and go through reasons for Suspension

Pupil is then invited to join the meeting to provide opportunity to go over points and to provide parents opportunity to discuss matter with their son.

Head sets Suspension period

Specifications made during the suspension period must be complied with such as behavioural contracts, visiting specialists or having some form of counselling.

End of Suspension period: the pupil and parents meet with Head to discuss their return to school and Class Teacher informed

Appendix 2 – exclusion procedure

Following return from Suspension, pupil continues to behave in an unacceptable manner

Repeat Suspension

Follow Appendix 1 procedure

Permanent Exclusion

Parents informed of incident

Parents meet Head and cause of exclusion made clear. Parents given chance to respond, and queries are addressed.

Pupil joins meeting and causes for their exclusion is made clear

Pupil asked to leave the premises

Eaton House School will assist in the transfer of pupil to another school through report writing and advice

All records of meetings kept on pupil's file

Appendix 3 – Reflection Sheet

Date:………………………………

At Eaton House The Manor Pre-Prep, boys learn how to make good choices regarding behaviour. Every boy has a responsibility to uphold our core values and to demonstrate them daily.

Today ………………………………………. did not make the best choice in relation to our values.

Eaton House Values	s
We value ourselves and each other	
We are curious and brave	
We seek adventure and fun	
We are determined and bounce back	
We act with kindness and respect	

What did I choose to do?

……

……

How did my behaviour make other people feel?

……

……

What will I do to put right the effects of my actions?

……

……

Next time, what would be a better choice to make?

……

……

Pupil signature…….

Teacher signature……….

Links to other policies

This subject policy links to the following policies and procedures:

- Inclusion policy;

- SEND policy;

Monitoring and review

This policy will be reviewed by the Headteacher on an annual basis.

EATON HOUSE THE MANOR (PREP)

BEHAVIOUR, DISCIPLINE

&

EXCLUSIONS POLICY

Contents

Aims

- To develop a whole School behaviour policy supported and followed by the whole School community; parents, teachers and children.
- By applying positive policies we aim to create a caring, family atmosphere in which teaching and learning can take place in a safe and happy environment.
- To teach, through the School curriculum, values and attitudes as well as knowledge and skills. This will promote responsible behaviour, encourage self-discipline and encourage in children a respect for themselves, for other people and for property. School Rules are displayed in all Class and Form rooms and the boys are taken through aspects of them in assemblies each term.
- To encourage good behaviour rather than to simply punish bad behaviour by providing a range of rewards for children of all ages and abilities.
- To make clear to children the distinction between minor and more serious misbehaviour and the range of sanctions that will follow.
- To treat problems when they occur in a caring and sympathetic manner in the hope of achieving an improvement in behaviour.
- To ensure that pupils with special educational needs are given equal opportunities to access the curriculum and that reasonable adjustments are made.
- To ensure that appropriate support systems are in place when pupils encounter difficulties
- To ensure that disciplinary action is taken against pupils who are found to have made malicious accusations against staff.

School Rules

These School rules have been formulated with the safety and well-being of the children in mind, and to enable the School to function efficiently as a place of learning. They have been written in consultation with all members of teaching staff and boys and are regularly reviewed. The rules are displayed clearly in the Homework Diary.

✠ BE KIND

Think about other people's feelings
Take care not to hurt others when playing
Don't bully or stand by and allow others to bully someone
Be inclusive; allow others to join games and activities
Apologise if you upset someone

✠ BE POLITE

Remember to say please and thank you
Hold doors open for others
Raise your hand if you want to say something in class, don't call out or interrupt
Respond to requests and instructions from teachers straightaway
Remember your table manners at lunch

✠ BE RESPECTFUL AND CONSIDERATE

Always tell the truth
Think of others before yourself
Walk sensibly around the School and line up quietly for lessons
Look after your own and other people's belongings
Take care of your School surroundings
Wear your uniform with pride

✠ BE THE BEST YOU CAN BE

Work hard in lessons
Don't distract others
Have a positive attitude and give everything a go

Positive Discipline

A major aim of the School policy is to encourage children to practice good behaviour by operating a system of praise and reward. Verbal and written praise are given as often as possible by all teachers to all children.

The Eaton House The Manor Positive Discipline Procedure is based on Good Shows, Housepaint's and certificates, through which children can be rewarded for academic and non-academic achievements, for effort and for being caring, and for all aspects of good work and behaviour.

All children are placed into one of four Houses, with siblings generally remaining in the same House. Children are awarded housepaint's for thoughtfulness, being helpful, good work etc. Each House's points are counted up at the end of the week, and a running total announced in assembly. At the end of each term a cup is presented to the House with the most points and to the individual pupil who has been awarded the most points. Good Shows (3HPs) are awarded by the Headmistress to pupils who demonstrate excellent work. The Headmistress or Senior Deputy sees pupils on teacher's recommendations. We hope that the senior boys (Head Boy and House officials) will encourage members of their House to try their best in every aspect of School life.

In some areas, certificates celebrating achievement will be awarded although this is left up to individual staff to adopt. In sport and performing arts, achievement is praised and publicly rewarded through the awarding of School Colours. Art, Music and Drama actively encourage pupils to practise good behaviour and achieve excellence through exhibiting work and performance. Children's acts of kindness are recognised and rewarded with Kindness certificates. Any Grades that are passed are delivered to School and the relevant boys names are read out to recognise their achievements.

At the end of each term there is Prize Giving. Prizes are awarded for effort and achievement. There are a wide range of cups and awards for academic and non-academic areas.

Children are encouraged to display their achievements in and out of School, in assemblies, and their work is displayed on boards throughout the School.

Most children respond to this positive approach where their efforts are seen to be valued, and make considerable efforts to improve their work, and, where necessary, their behaviour.

Continued positive behaviour and effort is often rewarded with positions of responsibility in Year 8.

Sanctions

Sadly, there will be times when children are badly behaved. Children need to discover where the bounds of acceptable behaviour lie, as this is a part of growing up.

Minor breaches of discipline are generally dealt with by the Form Teacher in a caring, supportive and fair manner, with some flexibility regarding age of the child, as far as sanctions are concerned.

Each case is treated individually. Generally, children are made aware that they are responsible for their own actions and that breaking rules will lead to punishments.

Normal sanctions include a verbal reprimand and reminder of expected behaviour, loss of free time such as playtimes (though not for more than half of the allocated time), moving to sit alone, sending work home, letters of apology, loss of responsibility and removal of House Points. Boys who lose one or two housepaint's discuss this with their Head of House.

Lunchtime Detentions are usually the strongest form of disciplining a Junior boy and should be given only after careful thought and consideration. Losing three house points in a week warrants a lunchtime detention as does serious instances of poor behavior. Lunchtime detentions are supervised by the Assistant Head Paul Russell on Friday lunchtimes. A record is kept. Three lunchtime detentions in a term will warrant an afterSchool detention in addition to meeting with parents to discuss supporting strategies for improving behaviour levels

After School Detentions are usually the strongest form of disciplining a Senior boy and should be given only after careful thought and consideration. Losing five house points in a week or a very serious incident of poor behaviour warrants an after School detention. All detentions are given by the Headmistress, and only after the boy's parents have been informed. All details of incidents leading to the detention are recorded. Detentions are held after School, generally on a Friday, from 4.00-5.00pm

Saturday Morning detentions are given only in exceptional circumstances, most likely if a boy continues to misbehave having recently had a Friday after School detention. They are supervised by the Headmistress.

Parents are always kept informed of their son's behaviour via informal meetings with teachers, or where necessary, formal meetings with the Assistant Head Pastoral or the Headmistress. If problems are persistent or recurring, children may then be placed on a School behaviour contract which both parents and pupil sign or daily or weekly report system (Home/School Diary) to monitor their behaviour with parents' support.

Major breaches of discipline may include physical assault, deliberate damage to property, stealing, leaving the School premises without permission, verbal abuse, refusal to work and disruptive behaviour in class. It is the responsibility of the Headmistress/Assistant Head of

Pastoral to apply the appropriate sanctions which may include suspension or permanent exclusion.

BEHAVIOURAL MANAGEMENT MODEL

BEHAVIOURAL ISSUE

MAJOR or MINOR

MINOR - in general tend to be classroom related (talking, not listening, lack of work/homework etc.

MAJOR – in general these are serious breaches of School rules; continued bad behaviour; bullying, dangerous or significant event, theft or vandalism of School property, poor/dangerous behaviour on School trips

Class/subject/form teacher deals with issue: - hp given out

Issue dealt with no further discipline required

Pupil continues to misbehave/repeatedly misbehaves/ignores warnings/ignores agreed actions

HOD: Communication sent home

HOY/HoH: Comunication home/ Detention

Student misbehaviour escalates

SMT (Asst Head Pastoral):

Detention

Parental meeting

Action plan

Behavioural report

Serious misconduct

safeguarding

Headteacher/Deputy Headteacher:

Detention

Weekend detention

Suspension

Expulsion

Procedures for dealing with Minor Breaches of Discipline

At all times staff should encourage good behaviour through praise and rewards. No member of staff must in any way physically chastise a child.

If there is a need for sanctions then the following may be used, depending on each child's needs:

- Redirect to another activity
- Talk to the child – discuss what has happened
- Discussion in groups or whole class
- Move the child from the group to work on his own
- Repeat work
- Miss part of playtime
- Remove child from the class – send to Assistant Head or Deputy Head.
- Parental involvement
- Behaviour contract or daily report or weekly report
- Action plan put in place (Asst Head Pastoral, Head of Well-Being, SEND, HOY/ Form tutor)

If the incident is of a more serious nature, it should be recorded in the Pastoral Behaviour Log.

Procedures for Dealing with Major Breaches of Discipline

- A verbal warning by the Assistant Head or Headmistress as to future conduct; parents informed
- A meeting with parents, and a warning given about the next stage unless there is an improvement in the child's behaviour
- If the pupil continues to persist in serious misbehaviour, the flow diagrams in Appendix 1 and Appendix 2 provide examples of the processes that may be adopted

NB A very serious problem may result in the normal procedure being abandoned and a child being taken home straight away.

Parents

Parents can help:

- By recognising that an effective School behaviour policy requires close partnership between parents, teachers and children
- By discussing the School rules with their child, emphasising their support of them and assisting when possible with their enforcement
- By attending Parents' Evenings, parents' functions and by developing informal contacts with School
- By knowing that learning and teaching cannot take place without sound discipline
- By remembering that staff deal with behaviour problems patiently and positively

Intervention which Requires Physical Restraint

If a child violently attacks another child or adult and does not respond to requests to calm down, then physical restraint is necessary.

The child should be removed from the situation as soon as possible and taken to the Assistant Head pastoral/Headmistress who will take immediate action to involve parents.

The incident should be documented.

The Headmistress will work with the member of staff and parents to devise an action plan to meet that child's needs. This may include the involvement of other agencies – social services, psychological services etc.

Corporal punishment.

Corporal punishment is unlawful in all circumstances. The School Standards and Framework Act 1998 states that the corporal punishment of a child cannot be justified by virtue of the position of a teacher or any other person who has lawful control or charge of a child being *in loco parentis***, ie in the place of the parent.**
The ban on corporal punishment applies to all Schools. Corporal punishment is defined as doing anything to a child, for the purpose of punishment, which would constitute battery.

However, anything done to avert an immediate danger of personal injury or damage to property would not be considered to be corporal punishment.

Intervention Strategies for Unauthorised Items

If you believe, or it is reported to you, that a pupil may have brought unauthorised items into School or there is a suspected theft, you must report the matter immediately to the Assistant Head Pastoral. In very serious incidents the Head Teacher and Principal will also be notified.

Action will then be taken, as follows.

1. The pupil will be seen in the presence of another member of staff and told that an accusation has been made.

2. The pupil will be asked to empty his pockets, bags, etc. in front of an appropriate member of staff and a witness. This may also extend to the pupil's locker.

3. If a pupil refuses, he will be detained and the parents will be contacted. The police may be contacted.

4. Parents will be informed of the accusation and the results of any subsequent search.

5. If any items are discovered found, the pupil will be questioned further by the Head Teacher and Assistant Head Pastoral with the parents and a witness in attendance. If the pupil's parents cannot be contacted, the interview will take place and they will be informed as soon as possible. The pupil will be asked to write his account of the situation if able to do so.

6. A decision as to whether the police should be called will be made in conjunction with the Head and parents. The decision will be influenced by:

   a. the item found

   b. whether other pupils are involved

   c. other wider circumstances.

At all points, the School reserves the right to inform the police if it deems it to be appropriate. Although each incident will be treated separately, the School is likely to take action in addition to any legal proceedings. The School will consider exclusion, and this will probably be permanent.

With incidents of drug and alcohol please refer to the Schools drug and alcohol policy.

Behaviour Modification Policy

At Eaton House The Manor, most of the children are well behaved. There are, however, occasions when individual children exhibit behaviour which is unacceptable. As part of the approach within our discipline policy of rewards and sanctions we use behaviour modification strategies to change individual children's behaviour. These are used by all staff.

Each child is different, so it is important that the cause of the behaviour is investigated and plans made to meet individual needs.

A wide range of rewards are used to reinforce positive behaviour. These can include:

- Change in classroom organisation
- Using different resources
- Differentiated work and tasks
- Rewards of House Points
- Use of certificates
- Sharing good behaviour with other children/other classes
- Good Shows
- Involving parents at an early stage to make an action plan together
- Behaviour contract/Behaviour Report
- Pupil entered on to Pastoral Mentoring System/added to the 'pupil watchlist' to ensure further monitoring and support

By using a reward system, and reinforcing good behaviour, we help children to move forward positively.

Suspension

Suspension from School will be as a direct result of several acts of poor behaviour or, in some cases, will be as a direct result of one major action of misbehaviour. Before suspension is reached a pupil will normally have gone through various stages of the discipline policy. If the pupil continues to persist in serious misbehaviour, the flow diagrams in Appendix 1 and Appendix 2 provide examples of the processes that may be adopted.

Appendix 1

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┌─────────────────────────────────────────────────────────────┐
│              Head Teacher has a series of meetings            │
└─────────────────────────────────────────────────────────────┘
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| Class Teachers/form tutors | Housemaster/Mistresses | Senior Management Team |

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┌─────────────────────────────────────────────────────────────┐
│ Parents are kept informed throughout the process if not fully│
│ involved in the meetings themselves.                         │
└─────────────────────────────────────────────────────────────┘
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┌─────────────────────────────────────────────────────────────┐
│ During meetings clear objectives and directives are issued,  │
│ minuted and communicated to the pupil.                       │
└─────────────────────────────────────────────────────────────┘
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┌─────────────────────────────────────────────────────────────┐
│              Decision reached to suspend pupil               │
└─────────────────────────────────────────────────────────────┘
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┌─────────────────────────────────────────────────────────────┐
│ Head Teacher/Asst Head pastoral to meet with parents and go  │
│ through reasons for suspension                               │
└─────────────────────────────────────────────────────────────┘
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┌─────────────────────────────────────────────────────────────┐
│ Pupil is then invited to join the meeting to provide         │
│ opportunity to go over points and to provide parents         │
│ opportunity to discuss matter with their child.              │
└─────────────────────────────────────────────────────────────┘
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┌─────────────────────────────────────────────────────────────┐
│              Head Teacher sets suspension period             │
└─────────────────────────────────────────────────────────────┘
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┌─────────────────────────────────────────────────────────────┐
│ Specifications made during the suspension period must be     │
│ complied with such as behavioural contracts, visiting        │
│ specialists or having some form of counselling.              │
└─────────────────────────────────────────────────────────────┘
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┌─────────────────────────────────────────────────────────────┐
│ End of Suspension period the pupil and parents meet with Head│
│ Teacher to discuss their return to School and class/form     │
│ tutors informed                                              │
└─────────────────────────────────────────────────────────────┘
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Appendix 2

Following return from suspension pupil continues to behave in an unacceptable manner

Repeat Suspension

Permanent Exclusions

Follow Appendix 1 procedure

Parents informed of incident

Parents meet Head and cause of expulsion made clear. Parents given chance to respond and queries are addressed.

Pupil joins meeting and causes for their expulsion is made clear.

Pupil asked to leave the premises.

Eaton House School will assist in the transfer of pupil to another School through report writing and advice.

All records of meetings kept on pupil's file.

Linked Policy

Safeguarding and Child Protection Policy

Anti-Bullying Policy

Equality of Opportunity Policy

MISSING CHILD POLICY

Author:	Mani Giri (Compliance Manager)
Responsibility:	Mrs Roosha Sue (Head, EHTM Nursery)
	Mrs Claire Fildes (Head, EHTM Girls')
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	Mr Ross Montague (Head, EHB)
	Mrs Sarah Segrave (Head of Prep, EHTM and Principal, Eaton House Schools)
Reviewed:	August 2024
Current version no:	V1
Approved by the Governing Body:	30th September 2024
Next review:	August 2025

Contents

Policy Statement

Eaton House Schools has robust procedures in place to minimise the risk of a child going missing during the School day, which includes School day and residential trips and sports fixtures. The welfare and safety of pupils is paramount.

This policy includes pupils in the EYFS.

Registration

Formal registration takes place by:

Eaton House the Manor Nursery	09:10 and 12:30
Eaton House the Manor Girls'	08:45 and 13:15
Eaton House the Manor Pre-Prep	08:45 and 13:10
Eaton House the Manor Prep	08:40 and 14:00
Eaton House Belgravia Nursery	08:50 and 13:45
Eaton House Belgravia Pre-Prep	08:50 and 13:45
Eaton House Belgravia Prep	08:50 and 13:45

If a child is missing from morning registration and the parent has not informed the School that the child is absent and the reason of absence the School will follow up with a call to the parent/carer as close to 9 am as possible. The call is made by the School secretaries and the register is updated. If the parent/carer is unable to be reached by 9.30 am, the School secretaries will communicate the parents by all means possible and this will be escalated to the Head Teacher/Deputy Head Teacher.

Morning registration procedures are in place to ensure that the School is made aware promptly that a child may have gone missing on the way to School. Afternoon registration procedures are in place to ensure additional headcount is in place and again to ensure all pupils are accounted for whilst at School.

Security

No unauthorised persons are permitted in the School. All visitors must sign in at reception and be accompanied by a staff member at all times. Any visitors who are wearing a visitor lanyard and are not accompanied by a staff member or any unauthorised person onsite will be challenged by a staff member and escorted back to reception. Where there is a visitor who has been DBS checked and authorised by the School to be onsite without being escorted by a staff member, the visitor will need to wear a School lanyard which states DBS checked.

The entrances at the front of the Schools have a door entry system and a holding area to prevent unauthorised entry into the School.

No child may be permitted to leave with an adult who has not been authorised to collect. If the parent/carer has arranged for another adult to collect their child this must be provided in writing with the person's full name, to the form teacher. If arrangements have been made for another parent to collect the child, the same procedures are followed.

At drop-off and collection, the doors and gates are manned by School staff. This is to prevent unauthorised persons entering the School as well as children leaving unaccompanied.

Supervision Whilst on Outings

Robust procedures are in place for School outings which includes sports fixtures. Good staff to pupil ratios are in place whilst on School outings. A head count is taken before leaving the School building, on the coach/minibus if travelling by transport, throughout the day particularly when moving around a venue and on arrival back at School.

Risk assessments are in place for each outing. When on School trips the staff lead will have received and reviewed the venue's risk assessment prior to the visit. Children are supervised at all times throughout the outings by School staff. On occasion parent volunteers accompany the School trip but volunteers are never left on their own with children. Volunteers are also informed of the risk assessment which provides the risk and mitigations.

Missing Child at School

We aim at all times to keep children safe and secure whether on School premises or in our charge off site. We take all reasonable precautions to ensure the safety of the children.

If a child goes missing from the School

In the event that a child goes missing from School we shall follow the procedures outlined below.

- Alert the Head or Deputy Head Teacher, who will make enquiries of relevant staff members as to when the child was last seen and where.
- The School secretaries will check the signing out book to establish whether the child has been collected from School and if this was the child's authorised parent/carer. Inform the Head/Deputy Teacher.
- The Head Teacher/Deputy Head Teacher will delegate to appropriate staff members who will undertake a thorough search of the building and outside area.
- The register is checked to make sure no other child has also gone astray.
- Doors are checked to see if there has been a breach of security whereby a child could wander out of the School building
- The CCTV footage at reception is checked to see if there has been a breach of security whereby a child could wander out of the School building
- Head Teacher or Deputy Head Teacher talks to staff to establish what happened
- If the child is not found the parent is contacted and the missing child reported to the police immediately.
- The Critical Incident Management Team are put in place.
- The School office make available the photograph of the child (from the School database) and their description.
- Continue to search, opening up the area, and keeping in touch via mobile phone.

If a child goes missing from an outing

In the event that a child goes missing on a School outing, the School will follow the procedures outlined below.

- As soon as it is noticed that a child is missing, staff on the outing ask children to stand with their designated person and carry out a headcount to ensure that no other child has gone astray. One staff member searches the immediate vicinity but does not search beyond that.
- The person in charge of the outing takes the lead.
- The staff lead will ensure that the rest of the staff remain with the children and that they are in a safe place and children are supervised.
- The staff lead will alert the management/security of the organisation/School being visited that a child is missing. The staff lead to provide a description of the child. In an

indoor venue the staff lead liaises with the venue's security who will handle the search.
- Staff lead to contact School office to inform them of the missing child.
- Head Teacher/Deputy Head Teacher informed immediately.
- If the child is not found after 15 minutes the staff lead must call the police.
- The Schools Critical Incident Management Team are put in place.
- The remaining children to be taken back to School.
- The Head Teacher contacts the child's parents who makes his/her way to the School or outing venue as agreed with the Head Teacher.

The Investigation

- The Principal and/or Head Teacher carries out a full investigation taking written statements from all staff present at the time, or who were on the outing.
- The key person/staff member writes an incident report detailing:
    1. The date and time of the report
    2. What staff/children were in the group or outing
    3. When the child was last seen in the group or outing
    4. What has taken place in the group or outing since then; and
    5. The time estimated that the child went missing.
- Collecting information from any other relevant adult witness, including officials from the venue where the child has gone missing off-site.
- Discussions, as appropriate with pupils.
- Assessing the effectiveness of risk assessment procedures.
- A conclusion is drawn as to how the breach of security happened.
- If the incident warrants a police investigation all staff co-operate fully. In this case, the police will handle all aspects of the investigation, including interviewing staff.
- Social Services may be involved if it seems likely that there is a child protection issue to address.
- The incident may require reporting to ISI, in respect of RIDDOR or any other official body.

Follow-Up

Implementing any subsequent actions resulting from the investigation. Informing staff and implementing the necessary measures.

Head of Wellbeing to provide support to any children, staff and parents who may have been affected by the incident.

Contents

Policy Statement

Eaton House Schools recognises its responsibility to safeguard and promote the welfare of all children. This is defined as:

- helping children with their needs as soon as the issue arise
- protecting them from maltreatment
- preventing impairment of their health or development
- ensuring that they grow up with safe and effective care
- taking actions to enable them all to have the best outcomes

All staff working in the School are expected to follow the code of conduct set out in this policy. This policy includes staff working in the EYFS.

The Aims of the policy

The purpose of this policy is to explain everyone's responsibilities regarding the safeguarding of pupils. It is based on the guidance Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges 2024.

Its overall aim is to provide protection for the pupils within the School. This includes:

- providing staff, peripatetic teachers, supply staff, volunteers and club providers with guidance and training on child protection procedures

- taking all reasonable measures to ensure that risks of harm to the welfare of pupils are minimised

- ensuring all appropriate actions to address concerns about the welfare of a pupil are undertaken within a given timescale

- working to agreed policies and procedures in full partnership with other agencies

Procedure

Guiding Principles

All staff have a responsibility to follow the guidance outlined in this policy and other related policies.

All staff will use the agreed procedures for passing any welfare concerns on to the appropriate person or persons.

This School seeks to safeguard pupils by:

- valuing them, listening to and respecting them

- adopting child protection guidelines and a code of conduct for all staff working in Schools

- ensuring all necessary checks are made when recruiting staff

- sharing information about child protection concerns with parents, staff and services

- providing effective management for staff through supervision, support and training

Staff training is available throughout the year and it is compulsory for all staff to have annual updates. The child protection policy and procedures are included in the induction process for all new staff. Policy newsletters are e-mailed to all staff regularly.

Whole School

Everyone who comes into contact with pupils and their families in the School environment has a role in safeguarding and promoting the welfare of children. The Schools general responsibilities are to:

- work with social care, the police, health and other services to promote the welfare of pupils and protect them from harm

- ensure there is a designated safeguarding lead in place who will:

  o support staff members in carrying out their duties

  o liaise closely with other services such as children's social care

- refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm to, a pupil and any member of staff it believes has committed one of a number of listed offences or would have been removed from their role had they not left

- ensure no volunteer is ever allowed to work unsupervised with pupils until they have a valid DBS certificate and reference checks

The Principal

The Principal responsibilities are to:

- have an effective and legally compliant child protection policy in place at all times

- audit compliance of the policy and review it annually

- contribute to inter-agency working

- ensure that safeguarding arrangements take into account the procedures and practice as set up by the Local Safeguarding Children Partnership (LSCP)

- appoint a designated safeguarding lead (Please refer to the Child Protection Policy)

- liaise with the LA and any other partner agencies on issues of child protection if an allegation of abuse is made against the Head

- Mrs Sarah Segrave, Principal and Governor Prof. Mark Bailey Deputy Chair of the board take the leadership responsibility for safeguarding arrangements

- ensure that there are procedures in place to handle allegations against members of the staff, peripatetic staff, supply staff, volunteers and external staff

- refer allegations against staff and volunteers to the local authority designated officer (LADO)

- have procedures in place to make referrals to the DBS if a person has been dismissed or removed due to safeguarding concerns (this is a legal duty and failure to refer when the criteria are met is a criminal offence)

Management

The School management team has a duty to:

- ensure that all staff have access to, and adhere to, the child protection policy and understand the procedures

- support the designated safeguarding lead and the staff in the implementation of the policy, including mentoring less experienced staff

- audit and evaluate the child protection procedures annually and report to the governing body

- ensure that all new appointments have clearance through the DBS and have been vetted and reference checks received before commencing work

- require new staff to complete safeguarding training as part of their induction

- provide other staff with training on at least an annual basis, including on updates or changes to legislation

- prohibit volunteers working unsupervised with pupils until they have a valid DBS certificate, references and training

Designated Safeguarding Leads

The key elements of the role of the designated safeguarding lead are to:

- manage referrals and refer all cases of suspected abuse to:

  o LA children's social care

- o the LADO (for child protection concerns and all cases that concern a member of staff)

- o the DBS (where a person is dismissed or has left due to risk or harm to a pupil)

- o the police (when a crime has been committed)

- liaise with Head Teacher's/Principal/Governors to inform them of issues, especially any ongoing enquiries under s.47 of the Children Act 1989 and police investigations

- act as a source of support, advice and expertise to staff on safeguarding matters

- be kept informs of low-level concerns which have been reported to the Head Teacher

- undertake advanced safeguarding training every two years and:

  - o understand the assessment process

  - o have a working knowledge of LA child protection case conferences

  - o ensure each member of staff (especially those who are new or part time) has access to and understands the child protection policy and procedures

  - o be alert to the specific requirements of pupils in need

  - o keep detailed, accurate secure written records of concern and referrals

  - o encourage a culture of listening to pupils

- work with Senior Management, Principal and Compliance Manager to ensure that the child protection policy is reviewed annually, and procedures are updated and reviewed regularly

- ensure that the policy is available publicly and parents are aware of the procedures

- ensure staff are regularly trained in safeguarding issues

- ensure that the child protection file is copied as soon as possible when pupils leave and is transferred separately from the main pupil file.

- to have a understanding the importance of information sharing, both within the School and with other Schools on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners.

- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), and
- be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.

Note: there must always be cover for this role and the role-holder should be contactable.

General Staff

Staff are responsible for:

- undertaking regular training in line with advice from the DfE and LSCP

- understanding their role in the child protection procedures

- knowing who the designated safeguarding leads are within the School

- knowing how to contact the designated safeguarding lead

- ensuring all pupils understand the child protection procedures

- being able to identify signs of abuse and neglect and pupils who may need extra help or who are suffering, or likely to suffer, significant harm

- taking appropriate action and informing the designated safeguarding lead immediately

- making notes of any conversations that may be shared with investigating agencies

- if there is a risk of immediate serious harm to a pupil, making a referral immediately to children's social care through the designated safeguarding lead

- informing the Head Teacher of low-level concerns

General Staff

Code of Conduct

Duty of Care

Adults should:

- Understand the responsibilities, which are part of their employment or role and be aware that these sanctions will be applied if these provisions are breached.
- Always act, and be seen to act, in the child's best interests
- Avoid any conduct which would lead any reasonable person to question their motivation and intentions
- Take responsibility for their own actions and behaviour

Exercise of Professional Judgement

Where no specific guidance exists staff should:

- Discuss the circumstances that informed their action, or their proposed action, with the Head Teacher. This will help to ensure that the safest practises are employed and reduce the risk of actions being misinterpreted
- Always discuss any misunderstanding, accidents or threats with the Head Teacher. Support staff such as admin team, housekeepers and maintenance team these concerns should be discussed with their line manager.
- Always **record discussions and actions in writing** taken with their justifications

Power and Positions of Trust

Adults should not:

- Use their position to gain access to information for their own advantage and/or a child's or family's detriment
- Use their power to intimidate, threaten, coerce or undermine pupils
- Use their status and standing to form or promote relationships with children, which are of a sexual nature

Confidentiality

Staff:

- Are expected to treat information they receive about children and young people in a discreet and confidential manner
- In any doubt about sharing information, they hold or which has been requested of them they should seek advice from a senior member of staff
- Need to be cautious when passing information to others about a child/young person. If unsure always check with senior management.

Propriety and Behaviour

Adults should not:

- Behave in a manner which would lead any reasonable person to question their suitability to work with children or act as a role model
- Make sexual remarks to a pupil (including email, texting, phone or letter)
- Discuss their own sexual relationships with, or in the presence of, pupils
- Discuss a pupil's sexual relationships in inappropriate settings or contexts
- Make (or encourage others to make) unprofessional personal comments which scapegoat, demean or humiliate, or might be interpreted as such

Dress and Appearance

Adults should wear clothing which:

- Promotes a professional and positive image
- Is appropriate to their role
- Is not likely to be viewed as offensive, revealing, or sexually provocative
- Does not distract, cause embarrassment or give rise to misunderstanding
- Is absent of any political or otherwise contentious slogans
- Is not considered to be discriminatory

Gifts

Adults should:

- Ensure that gifts received or given in situations which may be misconstrued are declared
- Generally, only give gifts to an individual young person as part of an agreed reward system
- Where giving gifts other than as above, ensure that these are of insignificant value and given to all children equally

Infatuations

Adults should:

- Report any indications (verbal, written or physical) that suggest a pupil may be infatuated with a member of staff and young people in School to the Head Teacher

Physical Education and other activities which require physical contact

Adults should:

- Consider alternatives, where it is anticipated that a pupil might misinterpret any such contact, perhaps involving another member of staff, or a less vulnerable pupil in the demonstration
- Be familiar with and follow recommended DfE guidance
- Always explain to a pupil the reason contact is necessary and what form that contact will take

Showers and Changing

Adults should:
- Avoid physical contact when children are in a state of undress
- Avoid any visual intrusive behaviour and where there are changing rooms:
    - Announce their intention of entering, preferably with another member of staff present
    - Avoid remaining in the room unless pupil needs require it

Adults should not:
- Change in the same place as children
- Shower with children

Pupils in Distress

Adults should:
- Consider the way in which they offer comfort to a distressed pupil
- Always tell a colleague when and how they offered comfort to a distressed child
- Record situations which may give rise to concern and inform the Head Teacher

Behaviour Management

Adults should:
- Not use force as a punishment
- Try to defuse situations before they escalate
- Keep parents informed of any sanctions
- Adhere to the Schools behaviour management policy

Care, Control and Physical Intervention

Eaton House Schools will:
- Regularly acquaint staff with relevant School policy and DfE Guidance
- Ensure that staff are provided with the appropriate training

Staff should:
- Adhere to the Schools policies
- Always seek to defuse situations
- Always use minimum force for the shortest period necessary

Sexual Contact with Young People

Adults should:
- Not pursue sexual relationships with children and young people either in or out of School
- Avoid any form of communication with a child or young person which could be interpreted as sexually suggestive or provocative i.e., verbal comments, letters, notes, electronic mail, phone calls, texts, physical contact.

One to One Situations

Adults should:

- Avoid meetings with pupils in remote, secluded areas of School
- Ensure there is visual access and/or an open door in one-to-one situations
- Inform other staff of the meeting beforehand, assessing the need to have them present or close by
- Avoid use of 'engaged' or equivalent signs wherever possible. Such signs may create an opportunity for secrecy or the interpretation of secrecy
- Always report any situation where a child becomes distressed or angry to a member of the Senior Management Team
- Consider the needs and circumstances of the child/children involved

Transporting Children for out of School activities where staff agree to undertake this

Adults should:

- Staff should not transport children in their own personal vehicles
- Staff should not be left alone with a child when pupils are being transported, the exception to this is designated School minibus drivers on the morning and afternoon School runs. If a child is not collected the designated minibus driver will follow the minibus driving procedures policy
- Be aware that the safety and welfare of the child is their responsibility until this is safely passed over to a parent/carer
- Report the nature of the journey, the route and expected time of arrival in accordance with agreed procedures
- Ensure prior to travelling that all arrangements such as the vehicle, passenger and driver safety have been taken into account when planning a School journey/trip
- Take into account any specific needs that the child might have

Educational Visits and After School Clubs etc.

Adults should:

- Always have another adult present in out of School activities unless otherwise agreed with the SMT in School
- Have parental consent to the activity
- Ensure that their behaviour always remains professional

First Aid and Administration of Medication

Adults should:

- Adhere to the Schools Safety Policies which may include Health and Safety Policy, First Aid Policy, Administering of Medication Policy
- Make other staff aware of the task being undertaken
- Explain to the child what is happening

Intimate Care (for example assisting with toileting or removing wet/soiled clothing)

Adults should:
- Follow the Intimate Care and Toileting Policy
- Make other staff aware of the task being undertaken
- Explain to the child what is happening
- Consult with colleagues where any variation from agreed procedure is necessary
- Record the justification for any variations to the agreed procedure and share this information with parents

Curriculum

Adults should:
- Have clear written lesson plans

Adults should not:
- Enter or encourage inappropriate or offensive discussion about sexual activity

Photography, videos and other Creative Arts

Adults should:
- Be clear about the purpose of the activity and about what will happen to the photographs when the lesson/activity is concluded
- Ensure that member of the SMT is aware that the photography/image equipment is being used and for what purpose
- Ensure that all images are available for scrutiny to screen for acceptability
- Be able to justify images of children in their possession
- Avoid making images in one-to-one situations
- Use School photography equipment where possible
- Ensure that photo consent forms are referred and adhered to

This means that adults should not:
- Take, display or distribute images of children unless they have consent to do so
- Always check the consent of use for pupils images and check with the Head Teacher
- Take photos of children on their own equipment
- Take photos of children where consent has not been given

Internet Use

Adults should:
- not communicate with pupils on any form of social media which includes online gaming
- staff member must always inform the Head Teacher if a pupil/s have tried to make contact or have contacted them either in person outside of School or online through social media or online gaming
- Follow the Schools Policies on the use of IT equipment

Concerns

Adults should:

- Report any behaviour by colleagues that raises concern and falls under low-level concerns to the Head Teacher. If the report is a safeguarding concern then the Designated Safeguarding Lead must be informed

Sharing Concerns and Recording Incidents

Adults should:

- Be familiar with the School system for recording concerns
- Take responsibility for recording any incident, and passing on that information where they have concerns about any matter pertaining to the welfare of an individual in the School or workplace
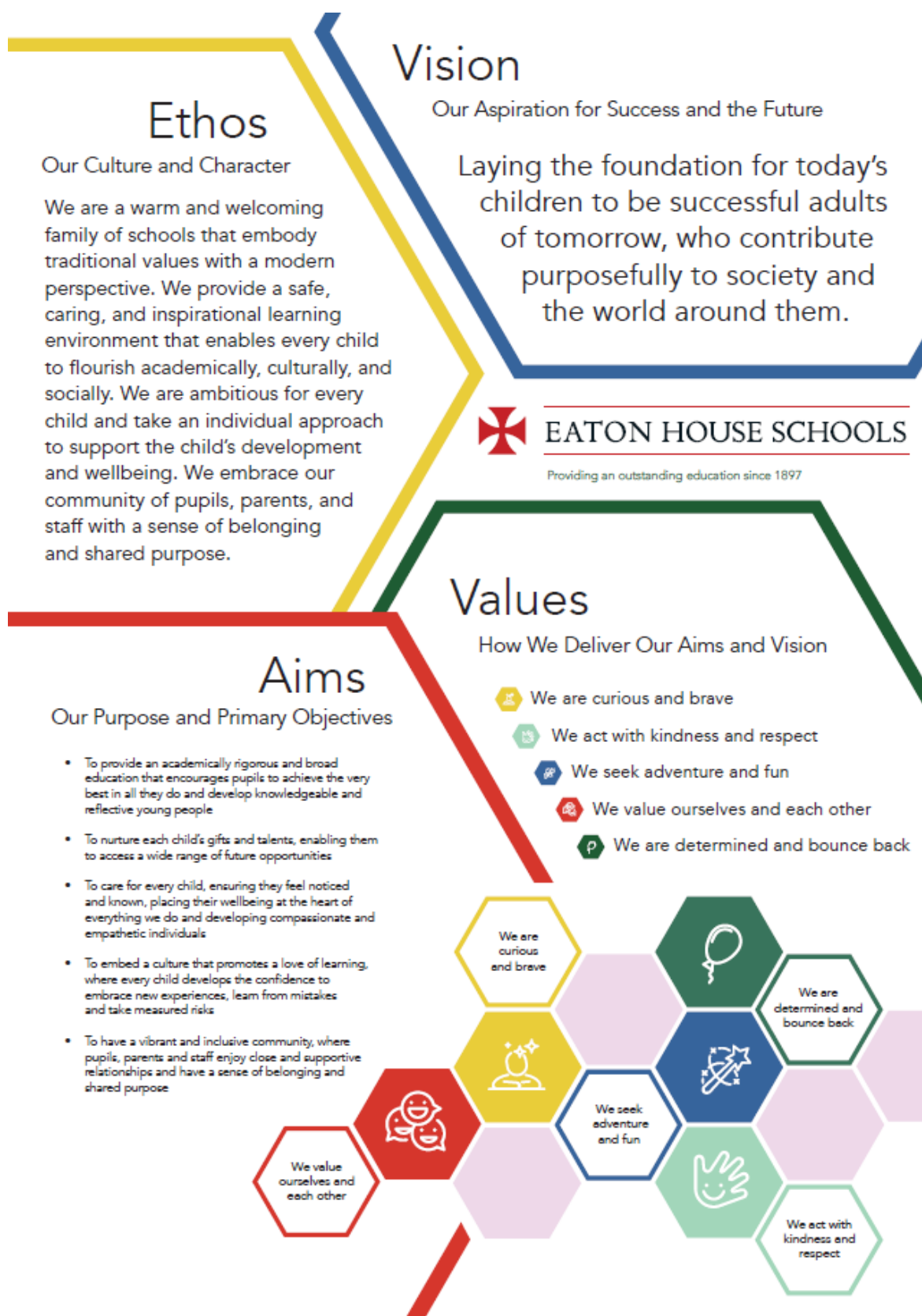
Work Colleagues

Our behaviour at work underpins our relationship with our colleagues. Any form of discrimination or abusive behaviour will not be tolerated. Staff should be courteous, considerate, helpful and respectful to their colleagues. It is important to give praise and encouragement creating a positive work environment for everyone working within the School. All staff are expected to involve themselves fully in the life of the School.

Monitoring and Evaluation

Monitoring is an ongoing process through data collection and observations. The child protection process and procedures are evaluated annually or when new legislation is introduced and amended accordingly.

Vision
Our Aspiration for Success and the Future

Laying the foundation for today's children to be successful adults of tomorrow, who contribute purposefully to society and the world around them.

Ethos
Our Culture and Character

We are a warm and welcoming family of schools that embody traditional values with a modern perspective. We provide a safe, caring, and inspirational learning environment that enables every child to flourish academically, culturally, and socially. We are ambitious for every child and take an individual approach to support the child's development and wellbeing. We embrace our community of pupils, parents, and staff with a sense of belonging and shared purpose.

EATON HOUSE SCHOOLS

Providing an outstanding education since 1897

Values
How We Deliver Our Aims and Vision

- We are curious and brave
- We act with kindness and respect
- We seek adventure and fun
- We value ourselves and each other
- We are determined and bounce back

Aims
Our Purpose and Primary Objectives

- To provide an academically rigorous and broad education that encourages pupils to achieve the very best in all they do and develop knowledgeable and reflective young people

- To nurture each child's gifts and talents, enabling them to access a wide range of future opportunities

- To care for every child, ensuring they feel noticed and known, placing their wellbeing at the heart of everything we do and developing compassionate and empathetic individuals

- To embed a culture that promotes a love of learning, where every child develops the confidence to embrace new experiences, learn from mistakes and take measured risks

- To have a vibrant and inclusive community, where pupils, parents and staff enjoy close and supportive relationships and have a sense of belonging and shared purpose

We are curious and brave

We are determined and bounce back

We seek adventure and fun

We value ourselves and each other

We act with kindness and respect

Our Values

How We Deliver Our Aims and Vision

- We are curious and brave
- We act with kindness and respect
- We seek adventure and fun
- We value ourselves and each other
- We are determined and bounce back

Other Linked Policies

Child Protection Policy

Equality of Opportunity Policy

Ethos, Aims and Objectives Policy

Selection and Recruitment Policy

Whistleblowing Policy

EATON HOUSE SCHOOLS

HEALTH & SAFETY POLICY

Author:	Mani Giri (Compliance Manager)
Responsibility:	Mrs Roosha Sue (Head, EHTM Nursery)
	Mrs Claire Fildes (Head, EHTM Girls')
	Mr David Wingfield (Head, EHTM Pre-Prep)
	Mr Ross Montague (Head, EHB)
	Mrs Sarah Segrave (Head of Prep, EHTM and Principal, Eaton House Schools)
	Mr Liam Corbett (Bursar, Eaton House Schools)
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Next review:	August 2025

Contents

Policy Statement

Senior management note the provisions of the Health and Safety at Work Act 1974 which states that it is the duty of every employer to ensure, so far as is reasonably practicable, the health, safety and welfare of employees, This includes a responsibility to take all reasonably practicable steps to secure the health and safety of pupils, staff, visitors, contractors and external hires using the School premises or participating in School-sponsored activities, both on the School site and away from it.

The aim of the senior management is "To provide a safe and healthy working and learning environment for staff, pupils and visitors."

The School provides the working environment for many groups of individuals and plays host to many others. It is important, therefore, that a safe environment is established in which children and adults can work together with confidence. It is the responsibility of the senior management team, Principal and Bursar to ensure this is the case.

Senior management believe that the adoption of safe methods of work and good practice by every individual can ensure everyone's personal health and safety. Senior management will take all reasonable steps to identify and reduce hazards to a minimum, but all staff and pupils must appreciate that their own safety and that of others also depends on their individual conduct and vigilance while on the School premises or while taking part in School activities.

The School will take all such steps as are reasonably practicable to fulfil its responsibilities, paying particular attention to regulations in the following areas.

- Management of health and safety, especially through risk assessment
- Control of substances hazardous to health
- First aid equipment, facilities and staff
- Fire precautions
- Maintenance of electrical systems
- Personal protective equipment
- Use of display screen equipment
- Manual handling operations
- Asbestos and legionella
- Working at height
- Noise

This policy applies to all areas of Eaton House Schools, including the EYFS.

Statement of Intent

The Principal is committed to achieving the highest standards of health and safety in respect of employees and to others involved in the activities of Eaton House Schools. Managing safety is an essential part of the way we work. It creates a strong working environment for staff and promotes the health and wellbeing of employees, enabling them to flourish at work. Important recreational and learning activities and events will not be prevented where risks are managed to acceptable standards.

Communicating the Policy

The Health and Safety Policy is communicated to new staff in the induction process. Any relevant health and safety information is communicated in the weekly staff meetings. A policy newsletter sent to all staff provides updated information as well as refresher reading. The Health and Safety Policy as well as any relevant linked policies are accessible on the School website. All staff are required to confirm they have read the policy via the e-learning platform iHasco. Health and Safety is on the agenda for the weekly Head Teachers meeting which is attended by all Head Teachers, Principal and occasionally the Bursar.

Duties of the Senior Management

The Principal and Bursar, in consultation with the Head Teachers, will:
- make themselves familiar with the requirements of the Health and Safety at Work. Act 1974, the Management of Health and Safety at Work Regulations 1999 and any other health and safety legislation and codes of practices (ACOPs) which are relevant to the work of the School.
- ensure that there is an effective and enforceable policy for the provision of health and safety throughout the School
- periodically assess the effectiveness of this policy and ensure that any necessary changes are made
- identify and evaluate all risks relating to:
    - accidents
    - health
    - School activities, including work experience
    - contractor management

- identify and evaluate risk control measures in order to select the most appropriate means of minimising risk to staff, pupils and others. (HSG 65 guidance: Plan, Do, Check, Act)
- create and monitor the management structure
- promote health and safety as an important management function which contributes to the efficiency of the service.
- ensure staff receive suitable and sufficient training in identified Health and Safety areas.

As far as is reasonably practicable the Principal, Bursar and the Head Teachers, will make arrangements for all staff, including temporary and voluntary staff and helpers and those on fixed-term contracts to receive comprehensive information on:

- this policy
- all other relevant health and safety matters

Duties of the Head Teacher

As well as the general duties which all members of staff have, the Head Teacher has responsibility for the day-to-day maintenance and development of safe working practices and conditions for teaching staff, support staff, pupils, visitors and any other person using the premises or engaged in activities sponsored by the School and will take all reasonably practicable steps to achieve this end through the heads of the appropriate departments, senior members of staff, teachers and others as appropriate.

The Head Teacher is required to take all necessary and appropriate action to ensure that the requirements of all relevant legislation, codes of practice and guidelines are always met in full.

In particular, the Head Teacher will:

- be aware of the basic requirements of the Health and Safety at Work, etc. Act 1974 and any other health and safety legislation and codes of practice relevant to the work of the School
- ensure, at all times, the health, safety and welfare of staff, pupils and others using the School premises, facilities or services, or attending or participating in School-sponsored activities
- ensure safe working conditions for the health, safety and welfare of staff, pupils and others
- ensure safe working practices and procedures throughout the School including those relating to the provision and use of machinery and other apparatus, so that all risks are controlled
- consult with members of staff, including the Principal, Bursar and Compliance Manager, on health and safety issues
- carry out suitable and sufficient risk assessments for all activities
- carry out periodic reviews and safety audits on the premises

- identify the training needs of staff and pupils and ensure, that all members of staff and pupils who have training needs receive suitable and sufficient training
- encourage staff, pupils and others to promote health and safety and to comply with requirements and policies, taking action on non-compliance as required
- ensure that any defects in the premises, plant, equipment or facilities are reported with immediate effect to prevent any incidents occurring.
- encourage all employees to suggest ways and means of reducing risks
- encourage all employees to report any incidents, hazards or defects and suggest ways and means of reducing risks
- collate accident and incident information and, when necessary, carry out accident and incident investigations
- monitor the standard of health and safety throughout the School, including all School-based activities, encourage staff, pupils and others to achieve the highest possible standards and discipline those who consistently fail to consider their own well-being or the health and safety of others
- monitor incidents and trends
- monitor first aid and welfare provision
- monitor the management structure, along with the Principal and Bursar

Duties of Supervisory Staff

All supervisory staff (e.g., heads of departments, co-coordinators, science technicians) will make themselves familiar with the requirements of the Health and Safety at Work, etc. Act 1974 and any other health and safety legislation and codes of practice which are relevant to the work of their area of responsibility.

In addition to the general duties which all members of staff have, they will be directly responsible to the Head Teacher or the member of staff nominated by the Head Teacher to have overall day-to-day responsibility for the implementation and operation of the Schools health and safety policy within their relevant departments and areas of responsibility.

They will take a direct interest in the Schools health and safety policy and in helping other members of staff, pupils and others to comply with its requirements.

As part of their day-to-day responsibilities, they will ensure that:
- safe methods of working exist and are implemented throughout their department
- health and safety regulations, rules, procedures and codes of practice are being applied effectively
- staff, pupils, volunteers and others under their jurisdiction are instructed in safe working practices

- new employees working within their department are given instruction in safe working practices, including fire arrangements
- regular risk assessments and safety inspections are made of their area of responsibility as required by the Head or as necessary
- positive, corrective action is taken where necessary to ensure the health and safety of all staff, pupils and visitors
- all plant, machinery and equipment in the department in which they work is adequately guarded and in good and safe working order
- all reasonably practicable steps are taken to prevent the unauthorised or improper use of all plant, machinery and equipment in the department in which they work
- appropriate protective clothing and equipment, first aid and fire appliances are provided and readily available in the department in which they work
- toxic, hazardous and highly flammable substances in the department in which they work are correctly labelled, used, stored and transported.
- they monitor the standard of health and safety throughout the department in which they work, encourage staff, pupils and others to achieve the highest possible standards of health and safety and discipline those who consistently fail to consider their own well-being or the health and safety of others
- signage used meet the statutory requirements
- all health and safety information is communicated to the relevant persons
- they report, as appropriate, any health and safety concerns to the Head Teacher, Estates Manager, Compliance Manager or Principal and Bursar.

Duties of All Members of Staff

All staff have a duty of care to themselves and of others for the health, safety and welfare of all employees, pupils, visitors and contractors.
All members of staff will:
- Take reasonable care of their own health and safety and that of others who could be affected by their actions or failure to act safely.
- Be familiar with the health and safety policy and follow all safety safety management systems as per the Schools policies and procedures.
- Report any accident, incident or near miss as soon as possible.
- Report any defects in premises, plant, equipment and facilities which they observe and report any shortcomings in health and safety arrangements to their line manager.
- Ensure that substances that are hazardous to health and/or safety are correctly used, stored and labeled. Trying to reduce the use of hazardous substances as much as possible ensuring more eco-friendly products are used.
- Take an active interest in promoting health and safety and suggest ways of reducing risks.
- Not tamper with any equipment relating to health, safety and welfare.

Hirers, Contractors and Others

Eaton House Schools must not expose risks to health, safety and welfare to: contractors, hirers and visitors to the premises. When the premises are used for purposes not under the direction of the Head Teacher then information must be provided on risks and controls to the contractors, hirers and others.

The Employer who engages the Contractors and/or Hirers must ensure that safe systems of work are in place and competencies are checked. There must also be a sharing of policies by either party.

The Head Teacher, Estates Manager, or Bursar who oversees the hirer/contractor will seek to ensure they conduct themselves and carry out their operations in such a manner that all statutory and advisory safety requirements are met at all times whilst on School premises.

When the premises are hired to persons outside the employment of the School, it will be a condition for all hirers, contractors and others using the School premises or facilities that they are familiar with this policy, that they comply with all safety directives of the School and that they will not without the prior consent of the Principal:
- introduce equipment for use on the School premises
- alter fixed installations
- remove fire and safety notices or equipment
- take any action that may create hazards for persons using the premises or the staff or pupils of the School.

Any contractor involved with construction of premises must adhere to the Construction (Design and Management) Regulations 2015 (CDM Regs).

Codes of Practice and Safety Rules

The senior management (where appropriate) taking into account the requirements of this statement will approve (where necessary) safe systems of work which all employees must adhere to.

Health and Safety Committee

A Health and Safety Committee has been established and will meet once per term to discuss Health and Safety core matters.

Risk Assessments

Suitable and sufficient risk assessments must be carried out for all activities and for the premises. These must be carried out by trained competent persons.

Emergency Plans

The Principal and Bursar will ensure that a critical incident plan is prepared to cover all foreseeable major incidents which could put at risk people using the premises or entering the School. This plan will indicate the actions to be taken in the event of a major incident so that everything possible is done to:
- save life
- prevent injury
- minimise loss.

This sequence will determine the priorities of the critical incident plan.

The plan will be agreed by senior management.

Fire and Evacuation

Fire safety arrangements, practice and guidance are documented in the fire policy and procedures.

All required maintenance and daily/weekly/monthly checks on fire detection and warning systems are carried out.

Detailed evacuation procedures are displayed in communal areas. Fire Escape routes are displayed in prominent positions in classrooms and common rooms.

Termly fire drills are carried out and recorded.

First Aid

The arrangements for first aid provision will be adequate to cope with all foreseeable major incidents.

The number of certificated first aiders will be determined by the risk assessment of the premises and activities carried out on/off site

Supplies of first aid material will be held at various locations throughout the School. They will be prominently marked and all staff will be advised of their position. The materials will be checked termly. Any products low in supply or approaching an expiry date must be reported to the School nurse (at Eaton House the Manor) and the Head's PA (at Eaton House Belgravia) promptly so that the items can be replenished.

Adequate and appropriate first aid provision will form part of the arrangements for all out-of-School activities.

A record will be made of each occasion any member of staff, pupil or other person receives first aid treatment either on the School premises or as part of a School-related activity. This is recorded in the accident and incident book. There is a Pupil accident and incident book which is used for pupils and they are held at designated points in the Schools for ease of access for staff to complete the forms. There is a designated recording of incident and accidents for staff, volunteers and any visitors to the School. This is kept in the School reception and with the Compliance Manager.

Legionella Procedures

Eaton House Schools ensures clear processes are in place for managing the risk of Legionella at both Eaton House the Manor and Eaton House Belgravia.

Infection prevention

Eaton House Schools will ensure there is good infection prevention and control measures in place which will help to manage the spread of Covid-19 and other infectious diseases.

The following infection prevention measures are in place.

- Ensuring all eligible groups are enabled and supported to take up the offer of national vaccination programs including COVID-19 and flu.

- Ensuring classrooms and all other rooms where spaces are occupied are well-ventilated. Encouraging fresh air to flow through the occupied space but also having a balance in keeping comfortable room temperature particularly in the winter season.
- Reinforcing good personal hygiene practices.
- Encouraging good hand hygiene by washing with warm water and soap regularly and use of hand sanitizer when not able to wash with water and soap.
- Good and regular housekeeping.

Should the government re-introduce covid guidelines, Eaton House Schools will follow those procedures.

Training

Suitable and sufficient training is provided to all employees as and when it is required to ensure their own health and safety or the health and safety of others who may be affected by the undertakings of the School. Where an employee is deemed at the outset to be competent to perform the tasks assigned to him or her, there might be no need for further training, however ongoing monitoring is in place.

Linked Policies

Risk Assessment Policy

EATON HOUSE SCHOOLS

CYBERBULLYING

POLICY

Author:	Mani Giri (Compliance Manager)
Responsibility:	Mrs Roosha Sue (Head, EHTM Nursery)
	Mrs Claire Fildes (Head, EHTM Girls')
	Mr David Wingfield (Head, EHTM Pre-Prep)
	Mr Ross Montague (Head, EHB)
	Mrs Sarah Segrave (Head of Prep, EHTM and Principal, Eaton House Schools)
	Mr Nick Segrave (IT Manager)
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CONTENTS

Policy Statement

The possibilities of the internet and mobile phones are endless. Young people benefit from having opportunity to have access to one another and communicate in a variety of different forms. However, not all aspects of Information Communications Technology (ICT) are positive, and it can enable additional routes for those intent on bullying.

Online behaviour is no different in principle from behaviour in the school or face to face. The same rules of politeness and consideration apply, as do the same sanctions for breaches of those rules.

Definition of Cyberbullying

Cyberbullying includes:
- text message bullying
- picture/video-clip bullying via cameras on mobile phones and similar devices
- phone call bullying via mobile phones or landlines
- email bullying
- sexting-related bullying
- chat room bullying
- bullying through instant messaging
- bullying via websites
- "de-friending", etc. on social networking sites (in some circumstances)

Although similar in many respects to other forms of bullying, cyberbullying also has some very specific features.
- It invades both home and personal space
- The size of the audience can be vast
- Electronically circulated messages can be difficult to control
- The bully can feel relatively anonymous
- It can have a large number of "bystanders" or "accessories"
- Much (if not all) of the bullying may take place out of school

The Aims of the Policy

Through this policy we aim to:
- raise awareness among pupils and staff about cyberbullying
- provide a safe learning environment in which preventative measures are in place to deter cyberbullying
- ensure systems are in place to deal with cyberbullying should it occur

Procedure

Prevention

In order that these aims can be fulfilled, a number of preventative measures will be taken.

Awareness-raising — Pupils

A number of opportunities have been highlighted as part of the curriculum to help pupils stay safe. This is included in our personal, social, health and citizenship education medium-term planning and also in our ICT curriculum. At the beginning of the school year, all classes will discuss safe use of the ICT suite during their first lesson. They will be reminded about the acceptable use policy and a copy of this will be sent out to parents.

If an issue relating to cyberbullying has arisen, the subject may be discussed during circle time. If this is in relation to a particular individual, consideration will be given to how the issue is raised. Pupils will be made aware of the importance of telling an adult, and which adults they can approach in school.

During Anti-bullying Week, cyberbullying is covered as part of whole-school assemblies and anti-bullying activities in all classes.

Issues relating to cyberbullying are raised with the Designated Safeguarding Leads and any problems and solutions are discussed. If any issues fall under Child Protection the Schools Child Protection Policy and procedures are followed.

If pupils wish to express a concern of complaint about the school, they are encouraged to speak to their form teachers and or pastoral team rather than resorting to social media. This is not intended to stifle legitimate concerns but rather to raise awareness that using social media to express these feelings can turn into cyberbullying if not used carefully.

Awareness-raising — Parents

Parents are invited to discuss any concerns or questions they may have with the ICT Co-ordinator. Parents are encouraged to take notice of their children's online activities and to discuss the risks with them. External organisations are invited in to provide training to parents on internet safety.

If parents wish to express a concern or a complaint about the school, they are encouraged to use the complaints system to do so. This is not intended to stifle legitimate concerns but rather to raise awareness that using social media to express these feelings can turn into cyberbullying if not used carefully.

Awareness-raising — School Staff

Staff have a duty to ensure that the pupils in their care stay safe, and that they themselves are alert to the dangers of cyberbullying. This can be particularly difficult for members of staff who have children and relatives in the school. All members of school staff can be affected and staff should inform a line manager at the first opportunity should any incident occur.

Bullying, and cyberbullying form part of INSET training during which new developments of potential sources of bullying may be raised and possible ways of challenging these discussed. New terminology used by the pupils is also shared at this session. Staff need to be aware of what the risks are and the potential for implications of misuse. On occasions an outside speaker is invited to update staff on latest developments.

Dealing with Cyberbullying Incidents

There is usually some visual evidence after cyberbullying has taken place. Pupils should be encouraged to pass this on to their parents; staff and parents should pass evidence on to the Head Teacher and Deputy Head Teacher. In some cases, it will be necessary to contact mobile phone companies, internet service providers or social networking sites to block material or have it removed. As online harassment is a crime, the police should be contacted in severe cases.

The following advice should be given to those experiencing cyberbullying.

- Do not retaliate or reply

- Save the material in question by making an electronic copy or screenshot

- Block or remove offenders from friends lists

- Review the information you are giving out

- Make sure you tell a senior staff member (or other appropriate adult, if you are a pupil)

- Try to keep calm and do not let the bully see a reaction

If the person responsible for the bullying is identified, sanctions will be applied under the behaviour policy (for pupils), the disciplinary procedure (for staff) or appropriate mechanism (for others). In addition, the following sanctions might be implemented, depending upon the nature and severity of the bullying.

- Confiscating equipment such as mobile phones

- Withdrawing access to the internet for a set period of time

- Limiting use of the internet for a set period of time

- Contacting the police, where the cyberbullying is sufficiently severe

- Informing external agencies such as social networking or email member sites

- Excluding pupils, either temporarily or permanently; dismissing or issuing disciplinary warnings to staff

Support will be provided for the victim. This may include meeting the bully to discuss what has happened and agree a way forward.

It is important that all pupils, parents and staff recognise that when an incident of cyberbullying takes place it is dealt with swiftly.

Use of the Internet in School

This school has its own acceptable use policy that clearly identifies how the ICT suite and internet should be used. Pupils and parents are reminded of this policy annually. Some of the main features are as follows:

- Pupils should not be allowed unsupervised access to the internet

- Pupils should be made aware of their own responsibility in reporting anything they identify that causes them concern

- Permission must be given from parents for pupils to use the internet and pupils must also agree to follow internet usage rules

The IT Engineer, ICT co-ordinators along with the senior leadership team are responsible, for reviewing how the school network is monitored.

Use of Mobile Phones in School by Pupils

Pupils are discouraged from bringing their mobile phones to school unless permission has been sought by parents and given by the Head Teacher. This might happen if an older pupil comes to school on his or her own and requires a mobile phone in case of emergencies.

It should be expressly understood and agreed that under no circumstances should the mobile phone be used while on school premises, including for taking photographs. The school retains the right to confiscate mobile phones where they are brought into school without permission or when they are being used inappropriately. Mobile phones must be handed into the school office at the start of the day and collected at the end of the day. Please see mobile phone usage policy.

Use of Mobile Phones in School by Adults

Although parents will bring mobile phones onto the premises, it must be understood that these should not be used for the purpose of taking photographs and they should be switched on to vibrate mode while on school premises.

No member of staff should make or receive personal calls during teaching time or be on social networking sights or on their phone for any other reason whilst they are teaching or supervising pupils or are on duty.

All members of staff must be careful about giving out their mobile number. Staff should not provide their personal mobile numbers. Mobile phones are taken out on school trips and visits and are used for school purposes such as contacting the school and in emergency situation.

Emailing and Instant Messaging

No member of staff may give a pupil their personal email address. Pupils and staff should never reply to unpleasant or unwanted emails or open files from people they don't know.

When writing emails or instant messages, think carefully about the content. When angry or distressed, you might send something likely to cause further anguish. Leave the computer and discuss the issue with someone else.

Social Networking Sites

Staff will not accept a pupil's invitation to be their "friend" on a social networking site. It is recognised that the removal or "blocking" of access to a social networking site might be seen as a form of bullying by those who experience it and this will be discussed as part of our PHSEE curriculum or tutorial system.

Bystanders

The issue of being a bystander or accessory is addressed with all pupils regularly. Pupils are encouraged to respect other people on and offline and to recognise how sharing a secret and passing on numbers and passwords can cause harm and distress to others.

Being a bystander can include:

- forwarding messages

- contributing to discussions

- taking part in an online poll

Recording and Reporting

The whole school community is made aware of ways of reporting incidents of bullying. Bullying is reported to a member of school staff who will then report it to his or her Head Teacher and Deputy Head Teacher, and the appropriate action will be taken. All incidents of cyberbullying are logged as part of the Schools anti-bullying strategy and this information is shared with the Senior management team.

SEND

Pupils with special educational needs and disabilities (SEND) are particularly vulnerable to all forms of bullying. Members of school staff are alert to changes in behaviour and ensure that there are opportunities and established methods for pupils with SEND to communicate should the need arise.

Equal Opportunities

As with other forms of bullying, cyberbullying is prone to being driven by prejudice. Staff are alert to the possibilities of sexist, racist and homophobic cyberbullying. Although all victims of bullying can be reluctant to discuss their experiences.

Linked Policies

Other policies which should be referred to include:

- Pupil Behaviour, Discipline and Exclusions Policy

- Anti-bullying Policy

- Discipline Policy

- ICT Acceptable Usage Policy

- Safeguarding and Child Protection Policy

EATON HOUSE SCHOOLS

LONE WORKING POLICY

Author:	Mani Giri (Compliance Manager)
Responsibility:	Mrs Roosha Sue (Head, EHTM Nursery) Mrs Claire Fildes (Head, EHTM Girls') Mr David Wingfield (Head, EHTM Pre-Prep) Mr Ross Montague (Head, EHB) Mrs Sarah Segrave (Head of Prep, EHTM and Principal, Eaton House Schools)
Updated:	September 2024
Current version no:	V1
Approved by the Governing Body:	30th September 2024
Next review:	September 2025

Contents

Summary

Lone working can be defined as those that work by themselves without close or direct supervision.

Eaton House Schools will ensure, so far as is reasonably practicable, that staff who are required to work alone or unsupervised for significant periods of time are protected from risks to their health and safety. Working alone either on site or off the premises can bring additional risks and Eaton House has developed this policy and associated procedures to control those risks and protect staff. It is important that staff understand these procedures and follow them at all times whilst working alone.

Apart from staff being sure that they are capable of doing the job on their own, the three most important things to be sure of are:

- the lone worker has full, and up to date, knowledge of the risks of working alone

- the lone worker knows what to do if something goes wrong

- someone else knows the whereabouts of the lone worker and what they are doing

- There is a suitable arrangement for the lone worker to contact someone to let them know when the lone working has finished

Employers' Duties

Assessments of the risks of working alone, carried out under the Management of Health and Safety at Work Regulations 1999, will confirm whether the work can be done safely by one unaccompanied person. This will include the identification of hazards from, for example, means of access and/or egress, goods, substances and environment, etc. Particular consideration will be given to:

- the remoteness or isolation of workplaces
- any communication problems
- the possibility of interference, such as violence or criminal activity from other persons
- the nature of injury or damage to health and anticipated "worst case" scenario
- the prohibition of any lone working where risks are unacceptably high

Employees' Duties

Under the Health and Safety at Work, etc. Act 1974 and the Management of Health and Safety at Work Regulations 1999, employees have a duty to:

- take reasonable care of their own health and safety and that of other people who may be affected by their activities at work
- co-operate with their employer to enable the employer to comply with their health and safety duties.

Conducting a Risk Assessment

A full risk assessment must be undertaken by the line manager if lone working must be carried out and the assessment will identify the following:

1. Identify the hazards of the job or specific activity, the lone working tasks to be undertaken and where and when the lone working occurs.
2. Identify the people at risk, including people who may work alone for part of the day, people other than employees, i.e. pupils and visitors, who may be at risk if a lone worker is unable to carry out their tasks without putting either themselves or others at risk.
3. Evaluate the risks and decide whether existing control measures are adequate or whether further action is needed.
4. Record the findings, devise suitable control actions and implement the measures.
5. Monitor the situation and review the assessment on a regular basis in order to check whether there are changes to the activity or persons involved. Revise assessment if necessary.

The risk assessment must be suitable and sufficient, meaning it must look at the lone working situation and anticipate all reasonably foreseeable problems. It is also important to ensure the person carrying out the lone working risk assessment is competent to do so and to consult the lone worker as part of the risk assessment to ensure they understand the risks and procedures.

Persons at Risk

Any members of staff working in the School alone during closure times are considered to be at risk. Examples may include:

- Teaching staff meeting parents or working with pupils or completing paperwork, marking papers or preparing lesson plans alone in a building outside of School hours
- Peripatetic teachers

- Maintenance or other staff attending to evening lettings alone or attending School sites alone at weekends in response to security alerts.
- Head Teachers completing paperwork alone in a building outside of School hours
- Maintenance staff working in a building alone during the School hours
- Support staff working alone in a building outside of School hours

Hazards

There are multiple hazards associated with lone working these may include, but are not limited too;

- potential violence or threatening behaviour towards staff
- the use of machinery, electrical or other equipment or chemicals
- working in remote areas, particularly after dark and outside normal working hours
- encountering intruders
- working at heights, using ladders
- work that involves manual handling.
- Members of staff who are regularly lone working are responsible for ensuring that the HR Department hold up to date and accurate medical information about them. Lone working should be avoided where health conditions could pose a risk to someone's health when alone.

Safe Systems of Work

Teachers and other staff working outside of normal School hours should be aware of the risks and take appropriate measures to ensure their own safety.

Any staff member wishing to work outside of normal School hours must inform their line manager.

the following procedures will be adopted when lone working takes place.

- Staff working alone (e.g. PE teachers working alone in playing fields, teachers working in isolated classrooms or on School trips, etc.) should always carry mobile phones.
- When meeting with parents who might be considered a risk, staff should wherever possible meet in a building occupied by others and during normal School hours. Staff must always sit nearest the door.
- If the School is aware in advance of any likely issues with a particular parent, then suitable precautions should be taken
- Home visits and School trips should always be approved by the Head Teacher or the Principal. Home visits should be avoided where possible and meetings arranged to take place in School.
- Staff and departments should arrange checking-in and out systems with either family, friends or work colleagues so that somebody always knows where people are and when they are due back at School/back home.

- Key holders (such as Estates managers/ Maintenance) should inform the Bursar when they are attending a letting, locking up after hours, attending an alarm call, etc.
- Additional supervision/buddying will be arranged as required
- Staff working alone should avoid high-risk activities, such as working at height, manual handling, electrical works, machinery, etc.
- Staff should adhere fully at all times to School security policies and procedures, especially those relating to locking up, visitors, wearing identify badges, signing-in to the site, responding to intruders, etc.
- Staff must be aware of emergency procedures and how to evacuate the building in the event of a fire.
- Staff must have access to first aid.

Departments should establish clear local procedures to set limits of what can and what cannot be done while working alone.

Rules and instructions should be developed, if necessary in writing, to cover the following.

1. Required ability of employees, e.g.:
   a. professional training
   b. qualifications and experience
   c. full knowledge of work planned
   d. medical fitness
2. Suitability of equipment, e.g.:
   a. adequate level of appropriate personal protective equipment supplied by employer
   b. insulation of portable lighting and other portable electrical appliances.
3. Task, e.g.:
   a. compliance with all job instructions
   b. avoidance of non-authorised or non-risk-assessed work
4. Means of communication, e.g.:
   a. mobile telephone
   b. remote manual or automatic alarm system
   c. regular visits by competent person
5. Provision for treatment of injuries, e.g.:
   a. portable first aid kit
   b. availability of first aider/emergency response
6. Emergency and accident procedures, e.g.:
   a. means of summoning help
   b. means of raising alarm
   c. rescue plans and equipment
   d. fire-fighting equipment.
7. Training, e.g. for safe use of specialised equipment and processes.
8. Supervision, e.g. for trainees, young people, or new recruits, who must be confirmed as competent to work alone before supervision is reduced to the level of occasional visits.

EATON HOUSE SCHOOLS

CHILD-ON-CHILD ABUSE POLICY

Author:	Mani Giri (Compliance Manager)
Responsibility:	Mrs Roosha Sue (Head, EHTM Nursery)
	Mrs Claire Fildes (Head, EHTM Girls')
	Mr David Wingfield (Head, EHTM Pre-Prep)
	Mr Ross Montague (Head, EHB)
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1

Contents

Introduction

The Principal, Senior Management team and all staff which includes volunteers and Peripatetic staff at Eaton House Schools are committed to the prevention, early identification, and appropriate management of child-on-child abuse both within and outside of School.

In particular, we believe that in order to protect children, the School should be aware of the nature and level of risk to which the pupils are or may be exposed to and put in place a clear and comprehensive strategy tailored to their specific safeguarding context. To take a whole-School community Contextual Safeguarding approach to preventing and responding to child-on-child abuse.

It is important to regard this policy as a preventative measure. We do not feel it is acceptable merely to take a reactive approach to child-on-child abuse in response to alleged incidents of it.

We believe that to tackle child-on-child abuse proactively, it is necessary to focus on all four of the following areas:

      (i) systems and structures

      (ii) prevention

      (iii) identification

      (iv) response /intervention

Recognising national and increasing concern about this issue and implementing this policy to mitigate harmful attitudes and child-on-child abuse in the School setting.

Parents should inform the School if their child is feeling unsafe due to the behaviour of any of their peers to ensure that appropriate and prompt action is taken in response.

Policy for Child-on-child Abuse

This policy relates to, and should be read alongside, the Schools Safeguarding and Child Protection Policy and any other relevant policies including, but not limited to, bullying including cyber-bullying, online safety, IT use, data protection, pupil behaviour, discipline and exclusions.

The policy sets out our strategy for improving, prevention, and identifying and appropriately managing child-on-child abuse. Designated Safeguarding Leads and senior management have consulted to ensure a well-rounded policy has been written.

This policy applies to all senior management team and all staff working in the School. The policy is reviewed annually, and updated as may be required, to ensure that the policy continually addresses the risks to which pupils may be exposed to.

It is important to recognise that abuse is abuse and should never be passed off as 'banter', 'just having a laugh', or 'part of growing up'.

To be compliant with the statutory guidance on child-on-child abuse as set out in Keeping Children Safe in Education

The terms 'victim' and/or 'perpetrator' should be avoided. The School takes a safeguarding approach to all individuals involved in concerns or allegations about child-on-child abuse, including those who are alleged to have been abused, and those who are alleged to have abused their peers, in addition to any sanctioning work that may also be required for the latter. Research has shown that many children who present with harmful behaviour towards others, in the context of child-on-child abuse, are themselves vulnerable and may have been victimised by peers, parents or adults in the community prior to their abuse of peers. Children who abuse should be held responsible for their abusive behaviour, whilst being identified and responded to in a way which meets their needs as well as protecting others.

This policy should, if relevant, according to the concern(s) or allegation(s) raised, be read in conjunction with the DfE's advice on Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (DfE's Advice) and any other advice and guidance referred to within it, as appropriate.

This policy should be read in conjunction with the Local Safeguarding Partnership's Safeguarding Policy and Procedures, and any relevant Practice Guidance issued by it.

What is Child-on-child Abuse

For these purposes, child-on-child abuse is any form of physical, sexual, emotional and verbal abuse, exercised between children, and within children's relationships, both intimate and non-intimate, friendships and wider peer associations. Child-on-child abuse can take various forms, including but not limited to; serious bullying including cyberbullying, relationship abuse, child sexual exploitation, harmful sexual behaviour, and/or prejudice-based violence including, but not limited to, gender-based violence. Examples of online child-on-child abuse would include sexting, online abuse, child-on-child grooming, the distribution of youth involved sexualised content, and harassment.

What is Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside the School. All staff but in particular the designated safeguarding lead (or deputy) should consider the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding. Assessments of children should consider whether wider environmental factors are present in a child's life that is a threat to their safety and/or welfare. It is important that staff and the designated safeguarding lead provides as much information as possible as part of the referral process. This will allow Children's social care assessment to consider all the available evidence and the full context of abuse.

When does behaviour become problematic or abusive?

All behaviour takes place on a spectrum. Understanding where a child's behaviour falls on a spectrum is essential to being able to respond appropriately to it.

Sexual Behaviours – The Brook Traffic Light Tool

Behaviours: age 0 - 5 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

GREEN BEHAVIOURS

- Holding or playing with own genitals
- Attempting to touch or curiosity about other children's genitals
- Attempting to touch or curiosity about breasts, bottoms or genitals of adults
- Games e.g. mummies and daddies, doctors and nurses
- Enjoying nakedness
- Interest in body parts and what they do
- Curiosity about the differences between boys and girls

AMBER BEHAVIOURS

- Preoccupation with adult sexual behaviour
- Pulling other children's pants down/skirts up/trousers down against their will
- Talking about sex using adult slang
- Preoccupation with touching the genitals of other people
- Following others into toilets or changing rooms to look at them or touch them
- Talking about sexual activities seen on TV/online

RED BEHAVIOURS

- Persistently touching the genitals of other children
- Persistent attempts to touch the genitals of adults
- Simulation of sexual activity in play
- Sexual behaviour between young children involving penetration with objects
- Forcing other children to engage in sexual play

What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or development ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercing, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Behaviours: age 5 – 9 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

GREEN BEHAVIOURS

- Feeling and touching own genitals
- Curiosity about other children's genitals
- Curiosity about sex and relationships, e.g. differences between boys and girls, how sex happens, where babies come from, same-sex relationships
- Sense of privacy about bodies
- Telling stories or asking questions using swear and slang words for parts of the body

AMBER BEHAVIOURS

- Questions about sexual activity which persist or are repeated frequently, despite an answer having been given
- Sexual bullying face to face or through texts or online messaging
- Engaging in mutual masturbation
- Persistent sexual images and ideas in talk, play and art
- Use of adult slang language to discuss sex

RED BEHAVIOURS

- Frequent masturbation in front of others
- Sexual behaviour engaging significantly younger or less able children
- Forcing other children to take part in sexual activities
- Simulation or oral or penetration sex
- Sourcing pornographic material online

What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or development ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercing, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Behaviours: age 9 – 13 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

GREEN BEHAVIOURS	AMBER BEHAVIOURS	RED BEHAVIOURS
• Solitary masturbation • Use of sexual language including swear and slang words • Having girl/boyfriends who are of the same, opposite or any gender • Interest in popular culture, e.g. fashion, music, media, online games, chatting online • Need of privacy • Consensual kissing, hugging, holding hands with peer	• Uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing • Verbal, physical or cyber/virtual sexual bullying involving sexual aggression • LGBT(lesbian, gay, bisexual, transgender) targeted bullying • Exhibitionism, e.g. flashing or mooning • Giving out contact details online • Viewing pornographic material • Worrying about being pregnant or having STIs	• Exposing genitals or masturbating in public • Distributing naked or sexually provocative images of self or others • Sexually explicit talk with younger children • Sexual harassment • Arranging to meet with an online acquaintance in secret • Genital injury to self or others • Forcing other children of same age, younger or less able to take part in sexual activities • Sexual activity e.g. oral sex or intercourse • Presence of sexually transmitted infection (STI)

What is green behaviour?	What is amber behaviour?	What is red behaviour?
Green behaviours reflect safe and healthy sexual development. They are: • displayed between children or young people of similar age or development ability • reflective of natural curiosity, experimentation, consensual activities and positive choices	Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be: • unusual for that particular child or young person • of potential concern due to age, or developmental differences • of potential concern due to activity type, frequency, duration or context in which they occur	Red behaviours are outside of safe and healthy behaviour. They may be: • excessive, secretive, compulsive, coercing, degrading or threatening • involving significant age, developmental, or power differences • of concern due to the activity type, frequency, duration or the context in which they occur

What can you do?	What can you do?	What can you do?
Green behaviours provide opportunities to give positive feedback and additional information.	Amber behaviours signal the need to take notice and gather information to assess the appropriate action.	Red behaviours indicate a need for immediate intervention and action.

Other Behaviours

When dealing with other alleged behaviour such as emotional and/or physical abuse staff should assess the alleged behaviour and decide how to respond.

This could include the following:

- Is the behaviour socially acceptable?
- Does it involve a single incident or has it occurred over a period of time?
- Is it socially acceptable within the peer group?
- Is it problematic and concerning?
- Does it involve any overt elements of victimisation or discrimination e.g. related to race, gender, sexual orientation, physical, emotional or intellectual vulnerability?
- Does it involve an element of coercion or pre-planning?
- Does it involve a power imbalance between the child/children allegedly responsible for the behaviour and the child/children allegedly the subject of that power?
- Does it involve a misuse of power?

Are some children particularly vulnerable to abusing or being abused by their peers?

Any child can be vulnerable to child-on-child abuse therefore staff should be alert to signs of such abuse amongst all children. Individual and situational factors can increase a child's vulnerability to abuse by their peers. Peer group dynamics can play an important role in determining a child's vulnerability to such abuse.

Child-on-child abuse may affect boys differently from girls and barriers to disclosure may also be different.

Children with Special Educational Needs and/or Disabilities are more likely to be abused than their peers without SEND. Also, additional barriers may exist when recognising abuse in children with SEND. This can be through assumptions made that indicator of possible abuse such as behaviour, mood and injury relate to a child's disability without further exploration. Also, there is the potential for children with SEND not to show any outwardly signs that they are being abused. Communication barriers and difficulties and overcoming these barriers will present a barrier in themselves.

Some children may be more likely to experience child-on-child abuse than others due to certain characteristics such as sexual orientation, ethnicity, race or religious beliefs.

What to do if you suspect or have a concern about child-on-child abuse?

You have a concern that a child/children may be at risk of or experiencing abuse by their peer(s)
Or
You have a concern that a child/children may be at risk of abusing or may be abusing their peers

Child speaks to you about child-on-child abuse they have witnessed or are part of.

Inform the Designated Safeguarding Lead (DSL) immediately with your concern.

- Listen to the child in a calm manner. Take your time.
- Keep your body language open and encouraging.
- Allow the child to lead the discussion if a disclosure is made but do not ask leading questions.
- Accept what the child says without challenge.
- Reassure them that they are doing the right thing by telling you.
- Explain who needs to be told.

Staff should in the first instance speak to the Designated Safeguarding Lead, however Staff members can make a referral directly to social services. The Designated Safeguarding Lead must be informed as soon as possible thereafter.

Referral not required

School takes relevant action, possibly including early help and monitors locally.

Referral made if concerns escalate

Referral required

Designated Safeguarding Lead makes referral to children's social care (police called if appropriate).

Responding to Concerns or Allegations of child-on-child abuse

It is important that all concerns and allegations of child-on-child abuse are handled sensitively, appropriately and promptly. The way in which child-on-child abuse is responded to can have a significant impact on our School environment.
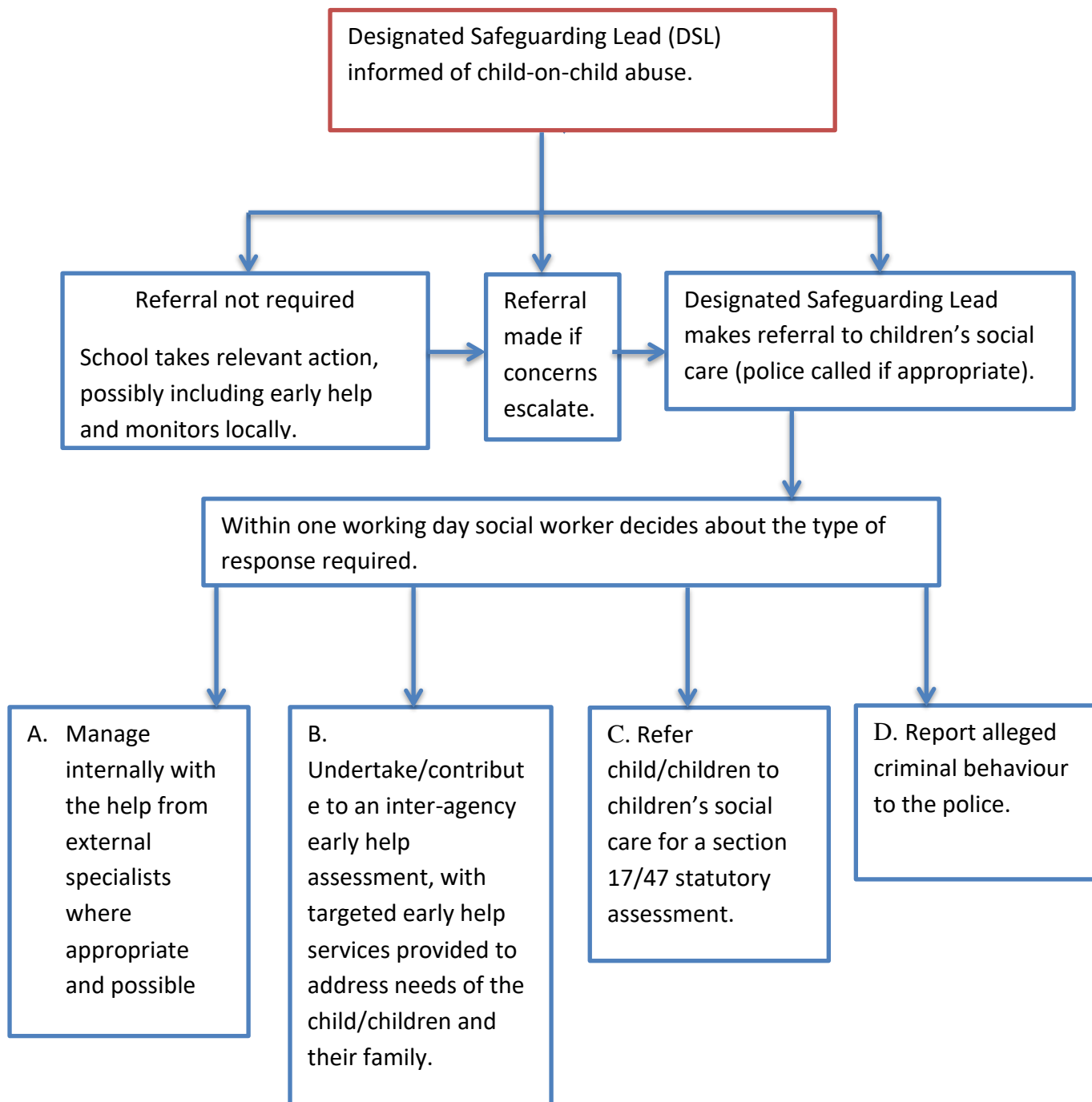
Any responses by the Designated Safeguarding Leads (Deputy Heads and Head Teachers) should:

- Include a thorough investigation of the concern(s) or allegation(s), and the wider context in which it/they may have occurred, as appropriate, depending on the nature and seriousness of the alleged incident(s), it may be appropriate for the police and/or children's social care to carry out this investigation.
- Take any immediate steps to ensure the safety of the child/children affected.
- Treat all children involved as being at potential risk. While the child allegedly responsible for the abuse may pose a significant risk of harm to the other children, the child may also have considerable unmet needs and be at risk of harm themselves. Eaton House Schools ensures that a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it, and additional sanctioning work may be required for the latter.
- Both pupils will be interviewed if appropriate as well as anyone else involved by the pastoral team which will include the Head Teacher and/or Deputy Head. All information must be recorded and kept confidential and secure by the Designated Safeguarding Lead. Parents/guardians of both parties will be informed and invited to the School to discuss the matter. Their support should be sought.
- Take into account that the abuse may indicate wider safeguarding concerns for any of the children involved, consider and address the effect of wider sociocultural contexts such as the child's/children's peer group, within and outside the School, family, School environment and the child's/children's online presence. Consider what changes may need to be made to these contexts to address the child/children's needs and to mitigate risk.
- Consider potential complexity of child-on-child abuse and of children's experiences, and consider the interplay between power, choice and consent. While children may appear to be making choices, if those choices are limited, they are not consenting.
- Consider views of the child/children affected. The Designated Safeguarding Lead and Head Teacher should discuss the proposed action with the child/children's parents unless considered unsafe to do so for e.g. where a referral needs to be made immediately.
- In borderline cases the Designated Safeguarding Lead may wish to consult with the children's social care and/or MASH on a no name basis, where possible, to determine the most

appropriate response. **Please note the social services for where the child lives must be contacted.**

Referral Pathways

Designated Safeguarding Lead (DSL) informed of child-on-child abuse.

Referral not required	Referral made if concerns escalate.	Designated Safeguarding Lead makes referral to children's social care (police called if appropriate).
School takes relevant action, possibly including early help and monitors locally.		

Within one working day social worker decides about the type of response required.

A. Manage internally with the help from external specialists where appropriate and possible	B. Undertake/contribute to an inter-agency early help assessment, with targeted early help services provided to address needs of the child/children and their family.	C. Refer child/children to children's social care for a section 17/47 statutory assessment.	D. Report alleged criminal behaviour to the police.

SAFEGUARDING

Kensington & Chelsea and Westminster / Hammersmith & Fulham

Worried about a child or young person?

WESTMINSTER
accesstochildrensservices@westminster.gov.uk
020 7641 4000 / Out of hours 020 7641 6000

KENSINGTON & CHELSEA
socialservices@rbkc.gov.uk
020 7361 3013

HAMMERSMITH & FULHAM
020 8753 6610 / Out of hours 020 8748 8588

YES

Children Social Care

Children and families who are at high risk of harm based on the London Continuum of Need will receive intervention and ongoing support.

UNSURE

MASH

Where the level of risk is not clear, MASH will gather further information to determine next steps for support.

NO

Early Help Hub

Children and families who are a lower risk of harm based on the London Continuum of Need will receive early intervention support through the Early Help Hub.

LADO

Allegations against Staff & Volunteers

If it is alleged that a person who works with children has:

- Behaved in a way that has harmed 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 they may pose a risk of harm to children

Westminster
LADO@westminster.gov.uk
020 7641 7668

Kensington and Chelsea
kclado.enquiries@rbkc.gov.uk
020 7361 3013

Hammersmith and Fulham
lado@lbhf.gov.uk
020 8753 5125

Other Key Contacts
Prevent Duty Hammersmith & Fulham and Kensington and Chelsea:
020 8753 5727   prevent@lbhf.gov.uk / prevent3@rbkc.gov.uk
Prevent Wesminster:
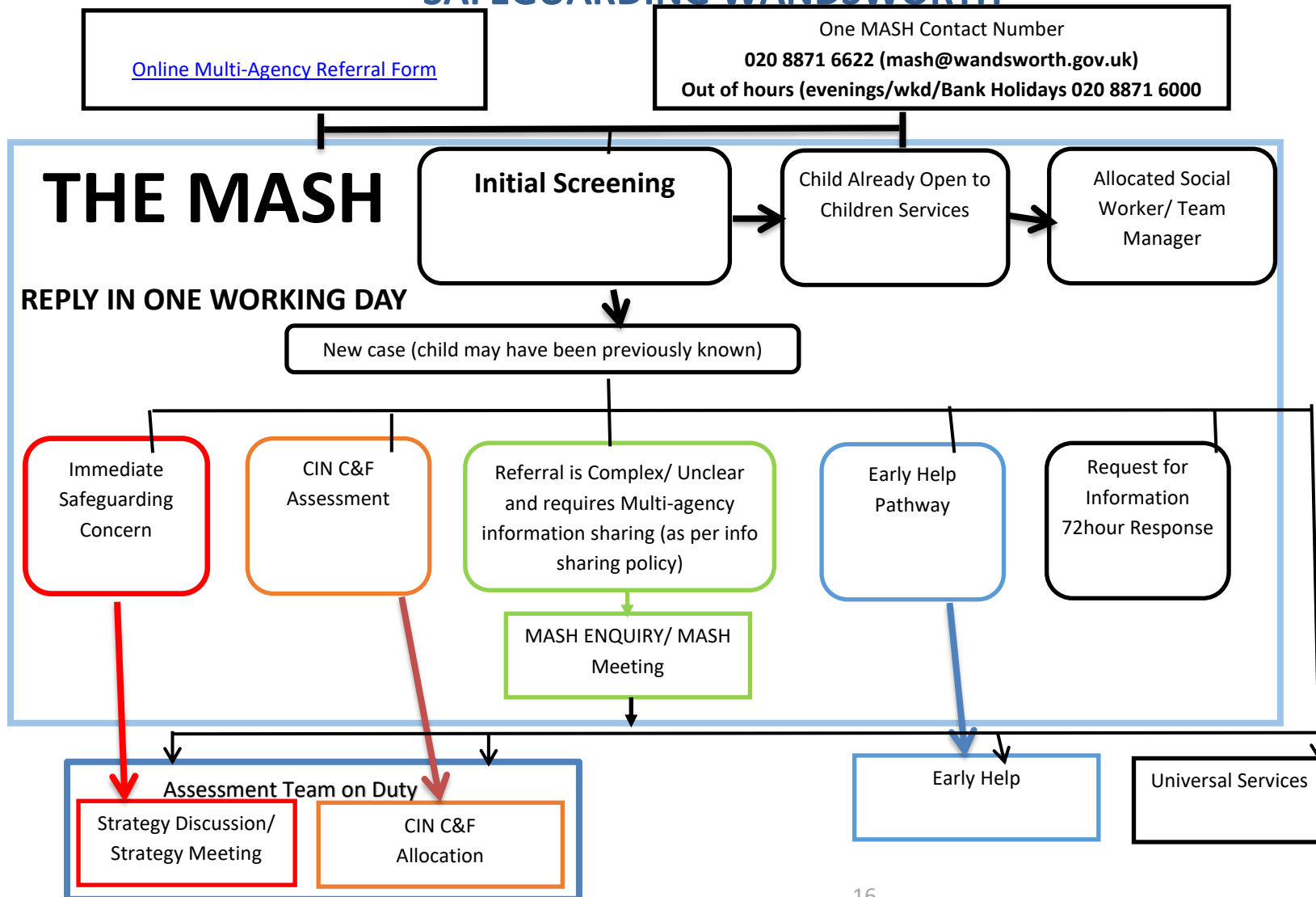 020 7641 5071 prevent@westminster.gov.uk
LSCP Team
07739 315388
Ofsted:
0300 123 1231   enquiries@ofsted.gov.uk

If a child is at immediate risk, call 999

SAFEGUARDING WANDSWORTH

Online Multi-Agency Referral Form

One MASH Contact Number
020 8871 6622 (mash@wandsworth.gov.uk)
Out of hours (evenings/wkd/Bank Holidays 020 8871 6000

THE MASH

REPLY IN ONE WORKING DAY

Initial Screening

Child Already Open to Children Services

Allocated Social Worker/ Team Manager

New case (child may have been previously known)

Immediate Safeguarding Concern

CIN C&F Assessment

Referral is Complex/ Unclear and requires Multi-agency information sharing (as per info sharing policy)

Early Help Pathway

Request for Information 72hour Response

MASH ENQUIRY/ MASH Meeting

Assessment Team on Duty

Strategy Discussion/ Strategy Meeting

CIN C&F Allocation

Early Help

Universal Services

16

LADO
Allegations against Staff & Volunteers

If it is alleged that a person who works with children has:

- Behaved in a way that has harmed 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 they may pose a risk of harm to children

LADO@richmondandwandsworth.gov.uk

mash@wandsworth.gov.uk

020 8871 7440

If a child is at immediate risk, call 999

Other Key Contacts
Prevent Duty: 020 8871 6622
Wandsworth Safeguarding Children Partnership: 020 8871 7401 wscp@wandsworth.gov.uk
Ofsted: 0300 123 1231 enquiries@ofsted.gov.uk

SAFEGUARDING LAMBETH

First Response Team

If you think a child is at risk of being abused or neglected please contact Lambeth Children's Social Care.

helpandprotection@lambeth.gov.uk   **020 7926 5555**

LADO

Allegations against Staff & Volunteers

If it is alleged that a person who works with children has:

- Behaved in a way that has harmed 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 they may pose a risk of harm to children

LADO@lambeth.gov.uk
020 7926 4679 or 077 2082 8700

All referrals must also be e-mailed to the LADO.

YES

Children Social Care

Children and families who are at high risk of harm based on the London Continuum of Need will receive intervention and ongoing support from the Referral and Assessment Team and Children in Need Teams.

UNSURE

MASH

Where the level of risk is not clear, MASH will gather further information to determine next steps for support.

NO

Early Help Hub

Children and families who are a lower risk of harm based on the London Continuum of Need will receive early intervention support through the Early Help Hub.

The Hub will undertake the initial contact, arrange the first TAC and determine community and targeted services which are best for the family.

If a child is at immediate risk, call 999

Other Key Contacts

Prevent Duty contact the Intergrated Referral Hub: 020 7926 5555   **helpandprotection@lambeth.gov.uk**

An online tool [Report child abuse to local council](#) directs you to the relevant local children's social care contact number.

Please note you must contact the local children's social care in which the child lives.

Full local procedures are available from the Local Safeguarding Children Board at www.londonscb.gov.uk

Whole School Approach

All staff are responsible in recognising and reporting child-on-child abuse. All staff support the on-going welfare of pupils, addressing underlying mental health needs and providing support.

There is the importance of promoting positive values and encouraging a culture of tolerance and respect amongst all members of the School community. Creating an environment where pupils have safe, positive and healthy relationships in the School community. Allowing children to have a sense of belonging and for them to be able to share their concerns openly, in a non-judgmental environment, and be listened to.

Child-on-child abuse cases should always be responded to promptly and appropriately. Creating a culture and understanding that all forms of child-on-child abuse, no matter how "low level" they may appear are taken seriously.

Ensuring that all child-on-child abuse issues are fed back to the Schools Designated Safeguarding Lead so that they can spot and address any concerning trends and identify pupils who may be in need of additional support and challenging the attitudes that underlie such abuse. This is done by weekly staff meetings at which all concerns about pupils are discussed. However, there should not be a delay in reporting concerns of child-on-child abuse to the Designated Safeguarding Lead immediately.

Children are educated about the nature and prevalence of child-on-child abuse, positive, responsible and safe use of social media (age appropriate) and the unequivocal facts about consent, via PSHE and the wider curriculum.

Pupils are told what to do if they witness or experience such abuse and the effect that it can have on those who experience it and the possible reasons for it, including vulnerability of those who inflict such abuse. They are told the Schools approach to such issues, including its zero-tolerance policy towards all forms of child-on-child abuse.

Engaging parents and encouraging them to inform the School if they feel there is a concern.

Disciplinary Action

Disciplinary action may be appropriate for any child/children involved. However, if there are police proceedings underway, or there could be, it is critical that the School, works in partnership with the police and or children's social care.

Where a matter is not of interest to the police and/or children's social care, Eaton House Schools may still need to consider what is the most appropriate action to take to ensure positive behaviour management. Disciplinary action may sometimes be appropriate, including to:

- Ensure that the child/children do take responsibility for and realises the seriousness of their behaviour
- Demonstrate to the child/children and others that child-on-child abuse can never be tolerated
- Ensure the safety and wellbeing of other children

However, these considerations must be balanced against any police investigation, the child's/children's own potential unmet needs, and any action or intervention planned regarding safeguarding concerns. Eaton House Schools will always consider its duty to safeguard all children in its care from harm, the underlying reasons for a child's behaviour, any unmet needs, harm or abuse suffered by the child, the risk that the child may pose to other children, and the severity of the child-on-child abuse and the causes of it.

In the event of a managed move, consideration must be given to sharing information with the receiving School regarding the child-on-child abuse to allow best protection of children in the new School.

Eaton House Schools understands that disciplinary interventions alone are rarely able to solve issues of child-on-child abuse, and the School will always consider the wider actions that may need to be taken and any lessons that may need to be learnt going forward.

Information sharing, data protection and record keeping

When responding to concerns or allegations of child-on-child abuse, Eaton House Schools will consider carefully, in consultation with children's social care, the police and other relevant agencies how to share information about the concerns or allegations with the pupils affected, their parents, staff and other pupils and individuals.

Information must be recorded that is necessary for the School and other relevant agencies to respond to the concerns or allegations and safeguard everyone involved.

It is important to keep a record of the legal purpose for sharing the information with any third party, including relevant authorities and ensure that the thirds party has agreed to handle the information securely and to only use it for the agreed legal purpose.

Eaton House Schools will be mindful to act in accordance with its safeguarding and data protection duties, including those set out in Working Together to Safeguard Children and the Government advice on information Sharing.

EATON HOUSE SCHOOLS

LOW LEVEL CONCERNS POLICY

Author:	Mani Giri (Compliance Manager)
Responsibility:	Mrs Roosha Sue (Head, EHTM Nursery)
	Mrs Claire Fildes (Head, EHTM Girls')
	Mr David Wingfield (Head, EHTM Pre-Prep)
	Mr Ross Montague (Head, EHB)
	Mrs Sarah Segrave (Head of Prep, EHTM and Principal, Eaton House Schools)
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Contents

Introduction

At Eaton House Schools, we are committed to creating a secure environment for everyone in the School community and a culture of openness, trust and transparency. This includes ensuring that adults who work with children do so in a way that is in accordance with the ethos and policies set out by the school, including the Staff Code of Conduct. This policy sets out the detail and processes for staff regarding low-level concerns they may have.

Summary

The school understands that low level concerns must be looked at as a whole school approach and facilitate an open and transparent culture within the school.

It may be possible that a member of staff acts in a way that does not cause risk to children, but is however inappropriate. How an adult behaves can influence those around them. A staff member may be going through bereavement, a relationship break-up, stress, anxiety, depression or struggling with their general wellbeing. This can cause extreme pressure for the staff member and affect their behaviour and how they interact with others and in turn impact pupils and colleagues. Therefore, it is important for us all to look out for one another and if a staff member has a concern for their work colleague or feels they themselves requires support they should refer to their Head Teacher. The Wellbeing Hub is available for further support as appropriate.

A low-level concern also includes an adult working in or on behalf of the school who may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO. Examples of such behaviour could include, but are not limited to being over-friendly with children, having favourites, taking photographs of children on their mobile phone or engaging with a child on a one-to-one basis in a secluded area or behind a closed door.

Low-level concerns and procedure

What is a low-level concern?

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that a staff member, or anyone working on behalf of the School, may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating children.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Self-referral

It is crucial that any such concerns are shared responsibly and with the right person, and recorded and dealt with appropriately, and early. It is important that staff feel confident to self-refer when they feel a situation may be misconstrued or if they have behaved in a way that falls below professional standards.

Acting early

Raising concerns early ensures that they can be dealt with effectively in order to reduce the possibility of harm, reinforce expected appropriate behaviour, as well as to protect staff from potential false allegations or misunderstandings.

Recognising inappropriate behaviour

All staff should be familiar with the Eaton House Schools Staff Code of Conduct, which sets out clear values and expected professional behaviour, so they can feel confident in distinguishing between appropriate and inappropriate or problematic behaviour and take action to help safeguard children.

It is important that staff feel comfortable with, and are clear about the concept of low-level concerns, and know what to do if they have a concern. Staff do not, however, need to be able to determine whether their concern is low-level, serious enough to consider referral to the LADO or whether it meets the threshold of an allegation. All concerns will be assessed by the DSL and the Principal

Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct

Allegation

Behaviour which indicates that an adult who works with children has:

- Behaved in a way that has harmed a child, or may have harmed a child; and/or
- Possibly committed a criminal offence against or related to a child; and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children

Low-Level Concern

It may be possible that a member of staff acts in a way that does not cause risk to children, but is however inappropriate.

How an adult behaves can influence those around them. A staff member may be going through

- Bereavement
- a relationship break-up
- stress
- anxiety
- depression
- struggling with their general wellbeing

This can cause extreme pressure for the staff member and affect their behaviour and how they interact with others and in turn impact pupils and colleagues. If you have a concern for a work colleague or feel you yourself may require support you should refer to your Head Teacher.

A low-Level Concern also includes an adult working in or on behalf of the school who may have acted in a way that:

- Is inconsistent with an organisation's staff code of conduct, including inappropriate conduct outside of work, and
- Does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary.

Appropriate Conduct

- Behaviour which is entirely consistent with the organisation's staff code of conduct, and the law.

Process to follow when a Low-Level Concern is raised

Concern or allegation received by Head Teacher and the DSL is kept informed

Is the concern or allegation about a current teacher, supply teacher, other staff, volunteer or a contractor

— NO → **Non-recent allegations from adults should go to the police.**

Non-recent allegations by a child should go to the LADO

— YES → **Contact the Local Authority's Designated Officer 'without delay'. See also flowchart for managing allegations**

YES

Has the person behaved in a way that has harmed a child or may have harmed a child?

— NO → **Has the person possibly committed a criminal offence?**

— NO → **Has the person behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children?**

— NO → **Has the person behaved or may behave in a way that indicates they may not be suitable to work with children?**

— NO →

YES

Steps should be taken to address unprofessional behaviour and support the individual to correct it at an early stage

← YES — **Is the person's conduct inconsistent with the staff code of conduct and school values, including inappropriate conduct outside of work; or is it otherwise not considered serious enough to consider a referral to the LADO**

The Head should collect as much evidence as possible from person who raised concern, the individual concerned and any witnesses. Low-Level concerns should be recorded in writing including:
- Name* of individual sharing their concerns
- Details of the concern
- Context in which the concern arose
- Action taken

(*if the individual wishes to remain anonymous then that should be respected as far as reasonably possible)

Steps taken to clarify acceptable behaviour consistent with staff code of conduct, school values and law, how it can be misconstrued, the importance of reporting concerns, any ambiguity in policies and procedures.

Records must be kept confidential, held securely and comply with Data Protection Act 2018. Schools and colleges should decide how long they retain such information, but it is recommended that it is kept at least until the individual leaves their employment

Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified

If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

The records' review might identify that there are wider cultural issues within the school that enabled the behaviour to occur. Therefore policies or processes could be revised and extra CPD may be needed to minimise risk of recurrence.

ACTIONS

What is a Low-Level concern?

The term 'Low-Level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out at KCSIE (2023) paragraph 356. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school or college may have acted in a way that:
- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO

Record Keeping

The school will retain all records of low-level concerns, including those that were found to be unfounded. The Head teacher will ensure that all records include the most accurate and up to-date information and will store them in the electronic low-level concerns file. The Head teacher will ensure that all low-level concerns are stored together, in an organised and consistent manner, to ensure they can be easily reviewed and analysed where necessary. They will be stored in accordance with the Schools GDPR and data protection policies.

Records will include:
- A clear and comprehensive summary of the concern.
- Details of how the concern was followed up and resolved.
- A note of any action taken, decisions reached, rationale for all decisions and action taken and the outcome.
- The name of the individual sharing concerns – if the individual wishes to remain anonymous, this will be respected as far as reasonably possible.

The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Head Teacher or those aware in the senior leadership team.

The DSL will periodically review the recent low-level concerns made to ensure that they are being appropriately dealt with and to check for any concerning behaviour patterns amongst the staff cohort as a whole. The DSL will keep records of these reviews.

Where any concerning patterns of behaviour have been identified with regard to a member of staff, the Head teacher will consult with the DSL to decide on a course of action. Where a pattern of behaviour has become so concerning that it meets the harms threshold, this will be referred to the LADO as soon as practicable.

Records of low-level concerns will not be kept in the personnel file of the individuals to whom the concerns pertain, unless there have been multiple low-level concerns made about the same individual. Where a concern is thought to be serious and is processed as an allegation, records of this will be kept in staff personnel files. Where multiple low-level concerns have been made about the same individual, these will be kept together, and in chronological order.

Where an allegation is made about an individual who has previously been subject to such allegations, or where a low-level concern is reclassified as a serious concern after meeting the harms threshold, all records of low-level concerns about that individual will be moved to the staff personnel file and kept alongside records of the allegation.

The DSL will ensure that all records are kept in a manner that is consistent with the Data Protection Policy. Records will be confidential, kept password-protected, and securely destroyed after the staff member to whom the concerns pertain has left the school.

The school will only refer to concerns about a staff member in employment references where they have amounted to a substantiated safeguarding allegation, i.e. it has met the harms threshold and has been found to have basis through investigation, or where it is not exclusively a safeguarding issue and forms part of an issue that would normally be included in a reference, e.g. misconduct or poor performance. Low-level safeguarding concerns will not be included in a reference, unless they have comprised a pattern of behaviour that has met the harms threshold

Whenever staff leave Eaton House School, any record of low-level concerns which are stored about them will be reviewed as to whether or not that information needs to be kept. Consideration will be given to:

a) whether some or all of the information contained within any record may have any reasonably likely value in terms of any potential historic employment or abuse claim so as to justify keeping it, in line with normal safeguarding records practice; or

b) if, on balance, any record is not considered to have any reasonably likely value, still less actionable concern, and ought to be deleted accordingly.

Low-Level Concern Form

Please use the form in Appendix A. The form is also available from:
- Compliance Manager
- Head Teacher
- DSL

Appendix A – Low-Level Concern Form

Staff can either use this form to share any concern or meet with a senior member of staff to discuss their concerns. If you have a concern for your colleague or you feel you yourself requires support, no matter how small and, if an adult may have acted in a manner which:

- is not consistent with Eaton House Schools Code of Conduct, and/or;
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

Where possible please speak with the Head Teacher as soon as possible and/or complete the below form and pass to the Head Teacher. The DSL will be kept informed. If the concern is about the Head Teacher, please pass it onto the DSL or Principal. If the concern is about the Principal please refer to the DSL or Governor. Remember, a low-level concern is different to an allegation (which uses a different form). See the table below for a definition:

Allegation   Behaviour which indicates that an adult who works with children has: • Behaved in a way that has harmed a child, or may have harmed a child; and/or   • Possibly committed a criminal offence against or related to a child; and/or   • Behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or   • Behaved or may have behaved in a way that indicates they may not be suitable to work with children
Low-Level Concern   It may be possible that a member of staff acts in a way that does not cause risk to children, but is however inappropriate.   How an adult behaves can influence those around them. A staff member may be going through   • Bereavement   • a relationship break-up   • stress   • anxiety   • depression   • struggling with their general wellbeing   This can cause extreme pressure for the staff member and affect their behaviour and how they interact with others and in turn impact pupils and colleagues. If you have a concern for a work colleague or feel you yourself may require support you should refer to your Head Teacher.   **A low-Level Concern also includes** an adult working in or on behalf of the school who may have acted in way that: • Is inconsistent with an organisation's staff code of conduct, including inappropriate conduct outside of work, and   • Does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary.
Appropriate Conduct   • Behaviour which is entirely consistent with the organisation's staff code of conduct, and the law.

Low-Level Concern Form	
Your details	
Name (optional)	
Role	
Date Written	
Signature (optional)	
Details of individual whom the concern is about	
Name	
Role	
Relationship to the individual reporting the concern, e.g. manager, colleague	
Details of concern	
Please include as much detail as possible. Think about the following: • What behaviour and/or incident are you reporting? • What exactly happened? • Why does the behaviour and/or incident worry you? • Why do you believe the behaviour and/or incident is not consistent with our Staff Code of Conduct?	

Details of any children or young people involved	
Name(s)	
Do you believe there is a risk of harm to the above children or young people, either now or in the future, as a result of the individual's behaviour? Explain your answer.	
Next steps	
What would you like to see happen in response to your concern	
Are you willing to meet with the DSL to discuss your concern?	
Please state any other information that you believe is relevant to the processing of this concern	
Signature (optional)	

For use by the Safeguarding team upon receipt of concern	
Date and time concern received	
Signature of DSL or Deputy DSL	
Actions to be taken For example: • No action • Investigation • Reclassification as allegation meeting the harms threshold	

EATON HOUSE SCHOOLS

SELECTION AND RECRUITMENT POLICY

Author:	Jessica Morse (Head of Human Resources) and Mani Giri (Compliance Manager)
Responsibility:	Mrs Roosha Sue (Head, EHTM Nursery) Mrs Claire Fildes (Head, EHTM Girls') Mr David Wingfield (Head, EHTM Pre-Prep) Mr Ross Montague (Head, EHB) Mrs Sarah Segrave (Head of Prep, EHTM and Principal, Eaton House Schools)
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Contents

Policy Statement

Eaton House Schools is committed to providing the best possible care and education to its pupils and to safeguarding and promoting the welfare of children and young people. The School is also committed to providing a supportive and flexible working environment to all its members of staff. At Eaton House Schools we recognise that, in order to achieve these aims, it is of fundamental importance to attract, recruit and retain staff of the highest calibre who share this commitment.

The aims of the Schools recruitment policy are as follows:

- to ensure that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position
- to ensure that all job applicants are considered equally and consistently
- to ensure that no job applicant is treated unfairly on any grounds including race, nationality, ethnic or national origin, religion or religious belief, pregnancy or maternity, sex or sexual orientation, marital or civil partner status, gender reassignment, disability or age
- to ensure compliance with all relevant legislation, recommendations and guidance including the Education (Independent School Standards) Regulations 2014 (**ISSRs**), the statutory guidance published by the Department for Education (**DfE**), *Keeping children safe in education* (2024) (**KCSIE**), *Disqualification under the Childcare Act 2006* (**DUCA**), the Prevent Duty Guidance for England and Wales and any guidance or code of practice published by the Disclosure and Barring Service (**DBS**); and
- to ensure that the School meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks.

Employees involved in the recruitment and selection of staff are responsible for familiarising themselves with and complying with the provisions of this policy, as well as completing all necessary training.

Data protection

The School is legally required to carry out the pre-appointment checks detailed in this procedure. Staff and prospective staff will be required to provide certain information to the School to enable the School to carry out the checks that are applicable to their role. The School will also be required to provide certain information to third parties, such as the Disclosure and Barring Service and the Teaching Regulation Agency. Failure to provide

requested information may result in the School not being able to meet its employment, safeguarding or legal obligations. The School will process personal information in accordance with its Staff Privacy Notice and GDPR

Recruitment and selection procedure

All applicants for employment will be required to complete an **application form** containing questions about their academic and employment history and their suitability for the role. Incomplete application forms will be returned to the applicant where the application deadline has not passed. Should there be any gaps in academic or employment history, a satisfactory explanation must be provided and these will be checked and discussed at the interview. A curriculum vitae will not be accepted in place of the completed application form.

Applicants will receive a job description and person specification for the role applied for, this policy and the Schools safeguarding and child protection policy and procedures.

The School will then conduct a shortlisting exercise by reviewing all application forms received in order to determine which applicants will be invited for interview. The shortlisting exercise will usually be conducted by two members of staff who will ideally also be involved in the interview process. Shortlisting may commence prior to the application deadline.

Shortlisted applicants will be invited to attend a **formal interview** at which their skills and experience will be discussed in more detail. Suitability to work with children will be assessed throughout the recruitment process.

If the School decides to make an offer of employment following the **formal interview**, any such offer will be conditional on the following:

- the agreement of a mutually acceptable start date and the signing of a contract incorporating the Schools standard terms and conditions of employment
- verification of the applicant's identity (where that has not previously been verified)
- a staff disqualification self-declaration form being reviewed by the School confirming suitability to work with children.
- verification of qualifications, whether professional or otherwise, which the School takes into account in making the appointment decision.

4

- verification of the applicant's employment history
- the School being satisfied that any information generated through online searches does not make the applicant unsuitable to work at the School;
- the receipt of two references (one of which must be from the applicant's most recent employer) which the Schools Principal considers to be satisfactory
- for positions which involve teaching work, information about whether the applicant has ever been referred to, or is the subject of a sanction, restriction or prohibition issued by the Teaching Regulation Agency which renders them unable or unsuitable to work at the School
- where the position amounts to regulated activity the receipt of an enhanced disclosure from the DBS which the School considers to be satisfactory including a barred list check
- for management positions, information about whether the applicant has ever been referred to the Department for Education, or is the subject of a direction under section 128 of the Education and Skills Act 2008 which renders them unable or unsuitable to work at the School
- verification of the applicant's medical fitness for the role
- verification of the applicant's right to work in the UK; and
- any further checks which the School decides are necessary as a result of the applicant having lived or worked outside of the UK which may include an overseas criminal records check, certificate of good conduct or professional references.

The School is not permitted to check the Children's Barred List unless an individual will be engaging in regulated activity. The School is required to carry out an enhanced DBS check for all staff, supply staff and governors who will be engaging in regulated activity. However, the School can also carry out an enhanced DBS check on a person who would be carrying out regulated activity but for the fact that they do not carry out their duties frequently enough i.e., roles which would amount to regulated activity if carried out more frequently.

Whether a position amounts to regulated activity must therefore be considered by the School in order to decide which checks are appropriate. It is however likely that in nearly all cases the School will be able to carry out an enhanced DBS check and a Children's Barred List check.

Artificial intelligence

The School does not use artificial intelligence software as a decision-making tool at any stage of the recruitment process, including in respect of external and internal applications and promotion proposals.

Pre-employment checks

In accordance with the recommendations set out in KCSIE, DUCA and the requirements of the ISSRs the School carries out a number of pre-employment checks in respect of all prospective staff.

In fulfilling its obligations to carry out pre-employment checks the School does not discriminate on the grounds of race, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, gender reassignment, disability or age.

Online searches

Eaton House Schools carries out online searches to further assess the suitability of shortlisted candidates.

The online searches the School carries out may include searches of internet search engines, websites and social media platforms.

Verification of identity, address, right to work in the UK and qualifications

All applicants who are invited to an interview will be required to bring with them evidence of their identity, right to work in the UK, address and qualifications (where required).

The School asks for this information at interview to ensure that the person attending the interview is who they claim to be, that they are permitted to work for the School if appointed and that they hold appropriate qualifications (where required).

Identity and address*:* all applicants must bring with them to interview, original documents which evidence their identity and address as set out below and in the list of valid identity documents at 0 (these requirements comply with DBS identity checking guidelines):

- one document from Group 1 and
- two further documents from either of Group 1*, Group 2a or Group 2b, one of which must verify the applicant's current address

Right to work in the UK*:* all applicants must also bring to interview a valid form of evidence which confirms their right to work in the UK. Valid forms of evidence can be found in the Home Office ['Right to Work Checklist'](#) and in some cases the evidence of your right to work in the UK can also be used as evidence of your identity for DBS identity checking purposes.

Qualifications: all applicants must also bring to interview original documents which evidence any educational and professional qualifications referred to in their application form and / or which the School requests as appropriate to the job role.

References

Eaton House Schools will aim to seek the references for shortlisted candidates before interview. Please note that no questions will be asked about health or medical fitness prior to any offer of employment being made. If the candidate does not wish the School to take up references in advance of the interview, they should notify the School at the time of applying. The School will ask all referees if the candidate is suitable to work with children. The School will compare any information provided by the referees with that provided by the candidate on the Application Form. Any inconsistencies will be discussed with the candidate. All offers of employment will be subject to the receipt of a minimum of two references which are considered satisfactory by the School. One of the references must be from the applicant's current or most recent employer. If the current / most recent employment does / did not involve work with children, then the second reference should be from the employer with whom the applicant most recently worked with children.
The School will compare all references with any information given on the application form. Any discrepancies or inconsistencies in the information will be taken up with the applicant and the relevant referee before any appointment is confirmed.

If it has not been possible to obtain a reference prior to interview it will be reviewed upon receipt. Any discrepancies identified between the reference and the application form and/or the interview assessment form will be considered by the School. The applicant may be asked to provide further information or clarification before an appointment can be confirmed.

All references received from a School must be countersigned by the Head of that School if the Head is not the sole provider of the reference.

DBS

The School applies for an enhanced disclosure from the DBS and a check of the Children's Barred List (now known as an Enhanced Check for Regulated Activity) in respect of all positions at the School which amount to regulated activity as defined in the Safeguarding Vulnerable Groups Act 2006. The purpose of carrying out an Enhanced Check for Regulated Activity is to identify whether an applicant is barred from working with children by inclusion on the Children's Barred List and to obtain other relevant suitability information. Any position undertaken at, or on behalf of the School will amount to regulated activity if it is carried out:

- frequently, meaning once a week or more; or
- overnight, meaning between 2.00 am and 6.00 am; or
- satisfies the period condition, meaning four times or more in a 30-day period; and
- provides the opportunity for contact with children.

Roles which are carried out on an unpaid / voluntary basis will only amount to regulated activity if, in addition to the above, they are carried out on an unsupervised basis.

The DBS disclosure certificate

The DBS issues the DBS disclosure certificate to the subject of the check only, rather than to the School. A convenient time and date for bringing the original certificate into the School should be arranged with HR as soon as it has been received. Applicants who are unable to attend at the School to provide the certificate are required to send in a certified copy by email as soon as the original disclosure certificate being received.

Employment will remain conditional upon the original certificate being provided and it being considered satisfactory by the School.

Starting work pending receipt of the DBS disclosure

If there is a delay in receiving a DBS disclosure the Head has discretion to allow an individual to begin work pending receipt of the disclosure certificate. This will only be allowed if all other checks, including a clear check of the Children's Barred List (where the position amounts to regulated activity), have been completed and once appropriate supervision has been put in place.

DBS Update Service

Where an applicant subscribes to the DBS Update Service the applicant must give consent to the School to check there have not been changes since the issue of a disclosure certificate. A barred list check will still be required.

Applicants with periods of overseas residence

For applicants who are living overseas, or who have lived overseas previously, obtaining a DBS certificate may be insufficient to establish their suitability to work at the School. In such cases the applicant will be required to provide additional information about their suitability from the country (or countries) in which they have lived. The Schools policy is to request such information from each overseas country in which the applicant has lived and worked for a period of three months or more in the previous five years.

When requesting such information the School has regard to relevant government guidance and will therefore always require the applicant to apply for a formal check from the country in question i.e. a criminal records check (or equivalent) or a certificate of good conduct.

The School recognises that formal checks are not available from some countries, that they can be significantly delayed or that a response may not be provided. In such circumstances the School will seek to obtain further information from the country in question, such as a reference from any employment undertaken in that country.

Prohibition from teaching check

The School is required to check whether staff who carry out teaching work are prohibited from doing so. The School uses the Teaching Regulation Agency Teacher Services system to check whether successful applicants are the subject of a prohibition, or interim prohibition order issued by a professional conduct panel on behalf of the Teaching Regulation Agency.

The School applies the definition of teaching work set out in the Teachers' Disciplinary (England) Regulations 2012, which states that the following activities amount to teaching work:

- planning and preparing lessons and courses for pupils
- delivering lessons to pupils
- assessing the development, progress and attainment of pupils; and
- reporting on the development, progress and attainment of pupils.

Prohibition from management check

The School is required to check whether any applicant for a management position is subject to a direction under section 128 of the Education and Skills Act 2008 which prohibits, disqualifies or restricts them from being involved in the management of an independent school (a **section 128 direction**).

The School will carry out checks for section 128 directions when appointing applicants into management positions from both outside the School and by internal promotion.

This check applies to appointments to the following positions made on or after 12 August 2015:

- Head
- teaching posts on the senior leadership team
- teaching posts which carry a departmental head role; and
- support staff posts on the senior leadership team.

The School will assess on a case by case basis whether the check should be carried out when appointments are made to teaching and support roles which carry additional responsibilities.

All individuals who are appointed to the governing body will be subject to a section 128 direction check.

The relevant information is contained in the enhanced DBS disclosure certificate (which the School obtains for all posts at the School that amount to regulated activity). It can also be obtained through the Teaching Regulation Agency Teacher Services system. The School will use either, or both, methods to obtain this information.

Childcare disqualification

The Childcare Act 2006 (**Act**) and the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (**Regulations**) state that it is an offence for the School to employ anyone in connection with our early years provision (**EYP**) or later years provision (**LYP**) who is disqualified, or for a disqualified person to be directly involved in the management of EYP or LYP.

All applicants to whom an offer of employment is made to carry out a relevant role in EYP or LYP will be required to complete a self-declaration form confirming whether they meet any of the criteria for disqualification under the Regulations.

The School cannot permit any person who is currently disqualified to start work in a relevant role. The School also reserves the right at its absolute discretion to withdraw an offer of employment if, in the opinion of the School, any information disclosed in the self-declaration form renders that person unsuitable to work at the School.

Medical fitness

The School is legally required to verify the medical fitness of anyone to be appointed to a post at the School, after an offer of employment has been made but before the appointment can be confirmed.

Successful applicants will be required to sign a declaration of medical fitness confirming that there are no reasons, on grounds of mental or physical health, why they should not be able to discharge the responsibilities required by the role. If an applicant prefers to discuss this with the School instead.

Contractors and agency staff

The School must complete the same checks for contractors and their employees) undertaking regulated activity at the School as it does for its own employees. The School requires written confirmation from the contractor that it has completed these checks on all of those individuals whom it intends will work at the School before any such individual can commence work at the School.

Agencies who supply staff to the School must also complete the pre-employment checks which the School would otherwise complete for its staff. The School requires confirmation that these checks have been completed before an individual can commence work at the School.

The School will independently verify the identity of individuals supplied by contractors or an agency and requires the provision of the DBS disclosure certificate before those individuals can commence work at the School.

Volunteers

The School will request an enhanced DBS disclosure and Children's Barred List information on all volunteers undertaking regulated activity with pupils at or on behalf of the School.

The School will request an enhanced DBS disclosure without Children's Barred List information on all volunteers who do not undertake regulated activity. This is likely to be because their volunteering duties are subject to regular, day to day supervision by a fully checked member of staff or by a volunteer who the School has deemed appropriate to supervise and ensure the safety of those pupils in their care.

Under no circumstances will the School permit an unchecked volunteer to have unsupervised contact with pupils.

Criminal Records Policy

The School will refer to the Department for Education document, Keeping Children Safe in Education in carrying out the necessary required DBS checks.

The School complies with the provisions of the DBS Code of Practice, a copy of which can be accessed here;

https://www.gov.uk/government/publications/dbs-code-of-practice

There are limited circumstances where the school will accept a check from another educational institution which are as follows:

This is where the new member of staff has worked in: –

- A School or a maintained School in England in a position which brought the new staff member regularly into contact with children or young persons;

- A maintained School in England in a position to which the new staff member was appointed on or after May 2006 and which did not bring them regularly into contact with children or young persons; or

- An institution within the further education sector in England or in a 16 to 19 Academy in a position which involved the provision of education or which brought the new staff member regularly into contact with children or young persons, during a period which ended not more than three months before the new staff member was appointment. However Eaton House Schools will still apply for an Enhanced disclosure. A separate barred list check will be obtained.

Policy on the Recruitment of Ex-Offenders

The School will not unfairly discriminate against any candidate for employment on the basis of conviction or other details revealed. The School makes appointment decisions on the basis of merit and ability. If an individual has a criminal record this will not automatically bar them from employment within the School. Instead, each case will be decided on its merits in accordance with the objective assessment criteria set out below.

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

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

for the School to knowingly employ someone who works in the relevant settings and is disqualified from providing childcare under the Disqualification under the Childcare Act 2006 (June 2016), or otherwise.

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

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

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

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

- the length of time since the offence or other matter occurred;
- whether the applicant has a pattern of offending behaviour or other relevant matters;
- whether the applicant's circumstances have changed since the offending behaviour or other relevant matters;
- in the case of disqualification from providing childcare, whether the applicant has or is able to obtain an Ofsted waiver from disqualification; and
- the circumstances surrounding the offence and the explanation(s) offered by the convicted person.

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

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

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

Referrals to the DBS and Teaching Regulation Agency

This policy is primarily concerned with the promotion and practice of safer recruitment. However, applicants should also be aware that the School has legal responsibilities to fulfil when employment comes to an end. In particular, the School has a legal duty to make a referral to the DBS where:

- an individual has applied for a position at the School despite being barred from working with children; and / or
- an individual has been removed by the School from working in regulated activity (whether paid or unpaid), or has resigned prior to being removed, because they have harmed, or pose a risk of harm to, a child.

The DBS will consider whether to impose sanctions on that individual which may restrict or prevent them from working with children in future.

In addition, if a teacher is dismissed because they are found to have committed serious misconduct, or they have breached the Teachers' Standards, or they resign prior to dismissal on such grounds, the School will make a referral to the Teaching Regulation Agency.

The Teaching Regulation Agency will consider whether to impose a prohibition from teaching order.

Appendix 1 List of valid identity documents

List of valid identity documents

Group 1: primary identity documents

- current valid passport
- biometric residence permit (UK)
- current driving licence photocard - full or provisional (UK / Isle of Man and Channel Islands)
- birth certificate - issued within 12 months of birth (UK, Isle of Man and Channel Islands - including those issued by UK authorities overseas, such as Embassies, High Commissions and HM Forces)
- adoption certificate (UK and Channel Islands)

Group 2a: trusted government documents

- current driving licence: photocard - full or provisional (all countries outside the UK excluding Isle of Man and Channel Islands)
- current driving licence paper version if issued before 1998 - full or provisional (UK / Isle of Man and Channel Islands)
- birth certificate - issued after time of birth (UK, Isle of Man and Channel Islands)
- marriage / civil partnership certificate (UK and Channel Islands)
- immigration document, visa or work permit (issued by a country outside the UK. Valid only for roles whereby the applicant is living and working outside of the UK. Visa / permit must relate to the non UK country in which the role is based)
- HM Forces ID card (UK)
- fire arms licence (UK, Channel Islands and Isle of Man)

All driving licences must be valid.

Group 2b: Financial and social history documents

- mortgage statement (UK)**
- bank / building society statement (UK and Channel Islands)*
- bank / building society statement (countries outside the UK)*
- bank / building society account opening confirmation letter (UK)*
- credit card statement (UK)*
- financial statement - e.g. pension or endowment (UK)**
- P45 / P60 statement (UK and Channel Islands)**
- council tax statement (UK and Channel Islands)**
- letter of sponsorship from future employment provider (non UK only; valid only for applicants residing outside the UK at the time of application; must be valid at time of application)
- utility bill (UK; not mobile telephone bill)*
- benefit statement - e.g. child benefit, pension (UK)*
- a document from central or local government/ government agency / local council giving an entitlement - e.g. from the Department for Work and Pensions, the Employment Service , HM Revenue & Customs (UK and Channel Islands)*
- EEA national ID card (must be valid at time of application)
- Irish passport card (cannot be used with an Irish passport; must be valid at time of application)
- cards carrying the PASS accreditation logo (UK, Isle of Man and Channel Islands; must be valid at time of the application)
- letter from Head or College Principal (UK; for 16-19 year olds in full-time education. This is only used in exceptional circumstances if other documents cannot be provided; must be valid at time of application).

Note

If a document in the list of valid identity documents is:

denoted with * - it should be less than three months old

denoted with ** - it should be less than 12 months old

Linked Policies

Safeguarding and Child Protection Policy

EATON HOUSE SCHOOLS

TRIPS POLICY

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Contents

Policy Statement

This policy is designed to provide practical information and guidance for group leaders and all other staff who participate in educational visits and all other School trips.

This policy also takes into account the requirements for children in the EYFS.

The Aims of the Policy

The aims of this policy are:
- to define the procedures for planning and preparing for an educational visit or School trip
- to define the procedures for assessing any risks that might be associated with an educational visit or School trip. This policy also takes into account the requirement for children in the EYFS
- to detail the procedures for informing parents, gaining their consent and, when appropriate, involving them in educational visits and School trips
- to define the roles and responsibilities of group leaders and other supervisors during educational visits and School trips
- to define the financial arrangements in relation to educational visits and School trips.

Planning and Preparation

The Head Teacher will authorise all out of School visits whatever the duration or purpose.

The Principal will be consulted for all School trips and their specific permission sought for any overseas trips.

In preparing for a School trip, the lead organiser will provide the following information to the Head Teacher:

- the nature, purpose and length of the proposed visit or journey
- the number and ages of the pupils who will be involved
- the proposed number of supervisors, including the ratio of teachers to other adults, and how this relates to any local authority regulations or guidelines
- the name and experience of the proposed party leader
- the experience of any adults other than teachers who have been asked to act as supervisors for the trip
- the proposed transport arrangements.

Verifying Providers

When using external providers for activities, Eaton Manor Schools are responsible for checking the appropriate safety standards and insurances. The Council for Learning Outside the Classroom (LotC) awards the Learning Outside the Classroom Quality Badge to organisations who meet this standard.

For organisations that do not hold the badge, the following must be checked:

- public liability insurance
- Health and safety and fire policies
- Accommodation
- Transport
- Risk assessments
- Staff competency
- Safeguarding arrangements
- Any licences where needed

For adventurous activities, the organisations must hold a licence as required by Adventure Activities Licencing Regulations (AALR). This certificate should be requested from the organisations in advance of booking the trip.

Risk Assessment

The lead organiser will undertake a thorough risk assessment for their educational visit or School trip. This must include:

Identifying potential hazards involved in the visit or activity?
- Who might be harmed by the hazards?
- What safety measures need to be put in place to reduce any risks to an acceptable level?
- Is the party leader able to put the safety measures in place without specialist assistance?
- What arrangements are there for dealing with an emergency and/or critical incidents?

The risk assessment will take into account:
- the type of activity and the level at which it is undertaken
- the age, competence, fitness and temperament of the group members
- any special educational or medical needs of individuals within the group
- supervision ratios
- the competence, experience and qualifications of the supervisory team
- the location, routes and modes of transport to venue.
- EYFS specific requirements

It is advisable to request the venue's/event's risk assessment which can be read in conjunction with the Schools.

The risk assessment must be read, understood and followed by all staff including volunteers that attend the trip. Staff and volunteers must acknowledge they have read and understood and agree to follow the procedures in place and confirm this by either signing the risk assessment or by replying back to the group leader's email.

Recommended Ratios

The risk assessment should take into account the activity, the number of pupils attending and the age and maturity of the pupils. This should assist determining the number of adults needed to accompany the trip.

The recommended ratio of supervisors to participants is:
- for EYFS – one adult to every 4 pupils;
- for Year 1 to Year 3 — one adult for every 6 pupils;
- for Year 4 to Year 8— one adult for every 15 pupils. For overseas trips it's recommended one adult for every 10 pupils.

Please note the ratios are not set in stone and should be increased depending on the risk assessment. Some examples where ratios may need to increase are: adventurous activities, different modes of transport, etc.

Informing and Involving Parents

The School will obtain parental consent for all School trips. A Parental consent and indemnity form is completed and signed by both parents at the start of the child's first year in School and will cover the duration of the time the child is at the School. If a child starts during the academic year the form will be completed at the time of admission.

The parental consent and indemnity permission form will give permission for emergency medical treatment if the parents cannot be contacted.

It is important that parents/guardians keep the School office updated with any changes to medical conditions, dietary needs and/or contact details. Parents/guardians can update the information through the Parent Portal. The Data Manager will then action the updates in the School system.

Parents will be given full information concerning the proposed out-of-School activity or visit.

Overseas Travel and Residential Visits in the UK

For journeys involving overseas travel or extended residential journeys in the UK, the School will always provide parents information before the trip.

Information will cover:
- the dates and time of departure and return
- the destination (with full address and telephone numbers)
- the name of travel company/coach company, method of travel
- the activities planned for the participants
- the cost and what it covers
- insurance arrangements
- the date after which the deposit cannot be returned if cancelling
- advice on pocket money
- the identity of staff who will be responsible for money
- a checklist of clothing and/or equipment required
- details of any inoculations required
- planned care for any pupils with special education or health needs
- the names of the group leader, deputy leader and other staff and or parents accompanying the party
- the rules
- contact details in case of an emergency.

The day School trips consent forms does not cover residential or overseas trips.
A separate parental consent form specific to such trips must be completed and signed by the parents for each residential or overseas trip.

If a child becomes ill and is unable to participate in an activity and must remain behind at the centre, then the child must be always supervised by two members of staff. One of the persons must be School staff.

Accompanying Parents or Other Volunteers

All parents or others who volunteer to accompany the party as one of the supervisors will be asked to complete a Disclosure and Barring Service check if an overnight stay is involved or if there is a possibility of them being alone with pupils. Their participation will require to be approved by the party leader, the Head Teacher and the Principal.

Please note any accompanying parents or other volunteers who do not hold a Disclosure and Barring Service check are required to always be supervised and may not be left alone with children. This is a legal requirement.

Roles and Responsibilities

The Educational Visits Co-ordinator

Is responsible for co-ordinating the School trips and ensuring all the necessary paperwork has been completed and providing support to staff in preparation for the School trips.

The main function of the Educational Visits co-ordinator is to:

- liaise with the group leaders to ensure the educational visits meet with requirements, including those of the Schools risk assessment
- ensure a risk assessment has been completed and all staff have read and understood the hazards and procedures in place for the School trip
- support the Head Teacher with co-ordinating School trips
- assess the competence of group leaders and other adults proposed for the visit, usually with reference to accreditation to lead or supervise a visit
- ensure there is adequate first aid trained staff on the School trip
- ensure all day trips consent forms are on file
- work with the group leader to ensure the residential or overseas trip consent forms have been completed and are on file
- keep records of individual visits, including reports of accidents or near misses
- Keep systems under review

The Group Leader

The group leader will have overall responsibility for the group at all times.

The group leader will be expected to have made an exploratory visit to the location if this is possible. Otherwise, detailed information of the centre and their risk assessments should be obtained before confirming the booking.

In delegating supervisory roles to other adults in the group the group leader will ensure that:
- supervisory responsibility is allocated to each adult for named pupils
- each adult knows which pupils they are responsible for
- each pupil knows which adult is responsible for them
- all adults understand that they are responsible to the group leader for the supervision of pupils assigned to them
- all adults and pupils are aware of the expected standards of behaviour.
- Following the trip, the group leader will evaluate the effectiveness of the trip, inform the Head Teacher/Educational Visits Coordinator of any concerns, and advise on future viability
- Updating the catering team of numbers of pupils absent for lunches on site
- Requesting packed lunches from catering team

Supervisors

Individual supervisors will be expected to:
- have a reasonable prior knowledge of the pupils including any special educational needs, medical needs or disabilities
- carry a register of all group members (this can be accessed through the Engage system) If a hard copy is required then this must be kept secure and shredded at the end of the trip.
- directly supervise the pupils, particularly when they are mingling with the public and may not be easily identified
- regularly check that the entire group is present
- have a clear plan of the activity to be undertaken and its educational objectives
- have the means to contact the group leader or other supervisors if needing help
- have prior knowledge of the venue (the group leader should normally have made an exploratory visit if possible)
- anticipate any potential risk by recognising hazards and act promptly where necessary
- continuously monitor the appropriateness of all activities and the physical and mental condition and abilities of the group and suitability of prevailing conditions
- exercise appropriate control of the group and ensure that pupils abide by the agreed standards of behaviour
- have a clear understanding of emergency procedures and be able to carry them out
- ensure that all pupils are aware of an appropriate rendezvous point
- ensure that all pupils know what to do if they become separated from the group
- have appropriate access to first aid and trained first aiders.

Financial Arrangements

Day trips are typically included in the School fees with some rare exceptions. Residential trip payments are taken over three terms of the academic year.

£100 per term will be added to the invoice for Eaton House the Manor Prep School as a contribution towards residential trips, with the remaining amount covered by fees.

Approved expenditure is to be submitted as a petty cash claim, after obtaining the appropriate Head Teachers authorising signature. The petty cash claim must be submitted to the finance department, in a timely manner.

The group leader will ensure that he or she has access to sufficient funds to meet any emergencies that can be reasonably foreseen. A pre-loaded debit card may be provided upon application.

Transport Arrangements

Teachers arranging trips that require transportation must complete a coach/minibus request form and e-mail this to the Data Manager who will confirm availability and/or costs, by e-mail.

Where a cost is involved, the teacher will need to check it fits the budget with their Head Teacher/Educational Visits Co-ordinator. Once the Head Teacher/Educational Visits Coordinator has agreed to the cost then the teacher needs to inform the Data Manager who will finalise the booking and confirm by e-mail.

Pupils' Pocket Money

The group leader will make appropriate arrangements to ensure that pupils' pocket money is kept safe and issued at regular intervals to ensure that individual pupils are not carrying excessive amounts of cash. However for Year 7 and 8 pupils, they will take responsibility for their own pocket money whilst on School trips.

SCHOOL TRIP RISK ASSESSMENT

School Trip Activity:		Location:		Date of School Trip:
Number of Pupils:		**Number of Staff:** (*Includes volunteers*)		**Risk assessed by:** (*Person in charge of school trip*)

Hazards Identified	Who may be harmed	Likelihood (A)					Seriousness (B)					Risk Level (A x B)	Risk Control Measures
		1	2	3	4	5	1	2	3	4	5		

Seriousness

		Catastrophic	Major	Moderate	Minor	Insignificant
		5	4	3	2	1
Very likely	**5**	25	20	15	10	5
Likely	**4**	20	16	12	8	4
Fairly Likely	**3**	15	12	9	6	3
Unlikely	**2**	10	8	6	4	2
Very Unlikely	**1**	5	4	3	2	1

Likelihood

Quantifying Risk

For the purpose of this process, we are using the following combination of severity and likelihood in order to give an indication of the risk involved for each hazard. **(Risk = Seriousness x Likelihood).**

17 - 25	**Unacceptable** **Stop activity and make immediate improvements**
10 - 16	**Tolerable** **Look to improve within specified timescale**
5 - 9	**Adequate** **Look to improve by next review**
1 - 4	**Acceptable** **No further action required. Maintain current controls**

School Trips Risk Assessment Form

The risks identified and the control measures have been communicated to all staff members and volunteers who will be on the school trip.

Names of Staff and Volunteers	Signature	Date

HAZARDS	Control measures and Precautions that staff agree to adopt as their normal practice
Ratios within the EYFS	All leaders will ensure that as a minimum EYFS ratios have been adhered to as detailed on the Out of School visits request form. In addition, all leaders will assess each trip on an individual basis and ensure that the ratios are specific to the trip and its inherent risks. For example, a higher ratio would be required for water activities.
Inadequate planning and organisation	Group leaders will have read and will follow Eaton House School Trips Policy All staff will be appropriately trained, experienced and qualified to competently fulfil their leadership roles and responsibilities All leaders will meet prior to departure to discuss and share risk assessments and plans All leaders will be made aware of their roles and responsibilities prior to departure Leaders will brief children regarding hazards Parents will be informed of arrangements prior to visits and written consent given
Exposure to adverse effects of weather	Staff will consider possible weather conditions, plan appropriate programmes, and ensure that children have appropriate clothing and equipment required (Inc. hat, sun cream etc.) Specialist personal protective clothing and equipment will be made available to group members if appropriate Staff will plan and make provision for children who may not bring suitable kit Staff will obtain daily weather forecast and adjust plans accordingly

School Trips Risk Assessment Form

HAZARDS	Control measures and Precautions that staff agree to adopt as their normal practice
Young person lost or separated from group	Group leader will ensure that supervising staff are competent and understand their roles Staffing ratios will be appropriate and sufficient Leaders will use suitable group control measures (e.g., buddy systems, large groups split in small groups each with named leaders, coloured caps etc) Staff will ensure that children are fully aware of itinerary and supervision/meeting arrangements Children will be briefed as what to do if separated from group Leaders will conduct regular head counts, particularly at arrival/departure points, and when separating and reforming groups
Visit returns after school hours	Parents/guardians and children will be fully informed regarding collection arrangements after a visit Children will not be left alone, and will be properly supervised after a visit until they have been safely collected or dropped-off A clear pre-planned procedure will be agreed for children who are not collected A child will not be left alone with just one member of staff
Emergencies	The school has an emergency plan for dealing with an incident on an educational visit At least one leader will carry a mobile phone

HAZARDS	Control measures and Precautions that staff agree to adopt as their normal practice
	Staff will carry sufficient cash or cards for pay-phones
	Leaders will have immediate access to a copy of Emergency Procedures, including all emergency contact numbers
	Leader and Headteacher/Emergency Home Contact will have instructions regarding what to do in an emergency
	Leaders will have an appropriate level of first aid training and at least one leader will have a current first aid qualification
	A complete first aid kit (and travel sickness equipment) will be checked and taken with the group
	The first aid kit will be easily accessed by all leaders
	Contact details of parents, group leader, school and head teacher/school contact's after-hours number will be held by group leader and school contact
	Leaders will prepare a contingency plan in the event of an accident or breakdown
Activities in, on or near water	All accompanying staff are made aware of the particular and higher risks associated with many water based activities
	Activities involving water will be carefully pre-planned and appropriate risk assessments and control measures put in place, including availability of life saving equipment and competent, trained staff.
	Staff will know the swimming ability and confidence of group members and will plan activities accordingly

School Trips Risk Assessment Form

HAZARDS	Control measures and Precautions that staff agree to adopt as their normal practice
Special medical, behavioural needs of specific young people	Up-to-date information regarding special/medical needs of all group members will be obtained
	Advice will be taken from SENCO, doctor, and parents/guardians, if appropriate
	Individual needs and associated specific risks will be identified, recorded and shared with all relevant personnel
	Children will have written parental consent and will inform leaders of medication taken or required
	Visit leader(s) will carry information regarding medical conditions and any relevant medication
	Staff will be fully briefed regarding those with known special/medical needs, and trained to treat/respond accordingly
	The programme/itinerary will be arranged with due regard to the mobility and special needs of all members of the group
	Particular care will be given to ensure safe access and involvement for all (e.g. for wheelchair users), especially with regard to transport, accommodation and activities
Misbehaviour/misconduct	Staffing supervision will be sufficient and appropriate to manage the group safely
	Children will be briefed regarding conduct/behaviour required
	Advice will be taken from SENCO and other staff if there are concerns over behaviour
	Individual risk assessments will be carried out if required

School Trips Risk Assessment Form

HAZARDS	Control measures and Precautions that staff agree to adopt as their normal practice
Allergic reactions, Poisons, stings, bites	Staff will be briefed regarding group members with known allergies, and will be trained to treat accordingly Staff will check that children and/or leaders carry any necessary medication Known high risk situations will be avoided, and appropriate avoidance action taken if necessary

School Trips Risk Assessment Form

EATON HOUSE SCHOOLS

SHARING OF CONCERNS AND WHISTLEBLOWING POLICY

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Contents

Summary

Eaton House Schools is committed to the highest standards of ethics, transparency, and accountability. The school has a culture of safety and of raising concerns and we value staff and reflective practise. The school wants to perform its duties in an honest and open way for the advancement of its pupils' education and positively encourages the identification and correction of failures that may hinder this practice.

The aim of this policy is to provide a framework which enable's individuals to raise matters of concern that are in the public interest (often referred to as whistleblowing), such as: malpractice, impropriety or wrongdoing, at a high level within the school, without fear of reprisal, so that they may be investigated and where appropriate acted upon.

At Eaton House Schools we welcome genuine concerns and is committed to dealing responsibly, openly and professionally in response.

This policy applies to all employees and workers and copies are to be provided when requested.

Employers' Duties

The Senior Management Team of Eaton House Schools:

- Develop an environment within the Organisation that encourages staff to share their concerns about actual or potential breaches of duty or a particular failure internally and in confidence
- Instances of whistleblowing must be made to the Principal or the Bursar
- Ensure that staff do not suffer any detriment or victimisation as a result of making a protected disclosure
- Ensure that any action taken against staff who make a disclosure is not related to that disclosure
- Ensure the disclosure is treated seriously and confidentially
- Under no circumstances attempt to suppress evidence of any breaches or failures
- Ensure that appropriate staff are trained to deal with whistleblowing and the related procedures.
- Is committed to tackling allegations of failures
- Will identify examples of failures and they will be dealt with seriously
- Give an assurance that allegations will be treated appropriately, investigated promptly and (if requested) confidentially
- Make it clear that victimisation or harassment of a whistle-blower will be considered a disciplinary offence which could lead to dismissal.
- Ensure that a staff member is not dismissed for making a protected disclosure
- Keep the whistle-blower informed, confidentially, about the steps being taken to address the disclosure

Employers should not

- Destroy any relevant evidence
- Fail to deal with the disclosure
- Fail to keep the whistle-blower informed about how the disclosure is being dealt with
- Discipline, dismiss or otherwise treat the whistle-blower unfavourably for making the disclosure
- Suppress evidence of any breaches or failures

Employees' Duties

Employees should:

- Always follow the internal procedures set down for whistleblowing
- In most circumstances, raise concerns internally to their Head Teacher or line managers before making a disclosure to any external body
- Comply with the Schools whistleblowing policy
- Consider making a disclosure to a prescribed regulator before disclosing it more widely
- If a case is exceptionally serious, and there are good reasons for doing so, bypass the disclosure procedures
- Ensure that any disclosure of information is "reasonable in all the circumstances".
- In relation to a whistleblowing allegation, not engage in harassing behaviour of the employer/manager concerned.

Employees' Rights

- A staff member will be protected from dismissal or victimisation if he or she follows the whistleblowing procedure when making a disclosure.
- Protection from dismissal or victimisation is available for disclosure concerning financial irregularities, criminal offences, law breaking, miscarriages of justice, mistreatment of pupils, health and safety risks, environmental damage or risks and any attempted concealment of any of these offences (whether they have occurred or are likely to occur).
- Any disclosure by a staff member must be dealt with in the strictest confidence if the staff member so wishes.
- Any staff member who believes they have suffered a detriment after making a protected disclosure can complain to the Head Teacher, senior management or the safeguarding governor.
- If the school fails to deal with any complaint from a staff member who feels they have suffered a detriment after making a protected disclosure, then the staff member can take their case to an employment tribunal.

Duties and Responsibilities

- A worker should report any malpractice they have witnessed within their organisation.
- Unless circumstances are exceptional, any concern should be raised internally before being referred to an external regulator or more widely if neither of the other options is appropriate.
- The whistleblowing procedure should always be followed when reporting a breach or failure.
- In relation to a whistleblowing allegation, a staff (or former staff member) should not engage in harassing behaviour of the employer/manager concerned.

Key Principles:

- Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. All members of the Organisation should be watchful for illegal or unethical conduct and are encouraged to report anything of that nature that they become aware of.
- All concerns raised by an individual will be treated fairly and properly.
- Where there are grounds for proceeding any matter raised under this policy will be investigated thoroughly, promptly, and confidentially.
- Individuals making a protected 'qualified disclosure' in line with this Policy will not be penalised for doing so.
- All complaints of victimisation of an individual for raising a qualified disclosure will be treated seriously and may provide grounds for disciplinary or other appropriate action.
- If misconduct is discovered as a result of any investigation under this procedure the Schools disciplinary procedure will apply, in addition to any appropriate external measures.
- Maliciously making a false allegation is a disciplinary offence.

This policy cannot be used by individuals to challenge financial and business decisions properly taken by Eaton House Schools or seek reconsideration of any matter already addressed under other internal procedures for example complaints, disciplinary and grievance procedures.

Qualifying Disclosures

A "qualifying disclosure" for the purpose of this policy is defined as one which "tends to show one or more of the following:-

- that a criminal offence has been committed, is being committed or is likely to be committed,
- that a person has failed, is failing or is likely to fail to comply with any legal obligation to which he is subject,
- that a miscarriage of justice has occurred, is occurring or is likely to occur,
- that the health or safety of any individual has been, is being or is likely to be endangered,
- that the environment has been, is being or is likely to be damaged, or
- that information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed"

Protected Disclosures

For a whistle-blower to be protected under the Employment Rights Act 1996 (as amended), the disclosure needs to be both a qualifying disclosure and a protected disclosure. They must be made in the public interest. Protected disclosures are made:

- to an employer
- to the person responsible for the breach or failure; the worker must reasonably believe that the person has a legal responsibility for the matter at the time they make the disclosure to that person — once the worker's belief is reasonable, it does not matter whether their belief is correct or not.
- to a legal advisor (this does not need to be in good faith) in the course of obtaining legal advice
- to prescribed persons (There is a full list of prescribed persons in the public Interest Disclosure (Prescribed Persons) (Amendment) order 2003.
- as an external disclosure (e.g. police, MP's, non-prescribed regulators)
- in an exceptionally serious case to a third party such as the police or a newspaper.

Internal Disclosure

A staff member should, if possible, first try to deal with any concern about a breach or failure internally. A disclosure will be a qualifying disclosure and therefore protected if it is made to:

- the staff member's employer, or
- another person whom the staff member reasonably believes to be responsible for the relevant failure.

Prescribed Persons

First, whistleblowing legislation protects those who make disclosures to "prescribed persons". There is a full list of the approximately 50 prescribed persons in the Public Interest Disclosure (Prescribed Persons) (Amendment) Order 2003. The list includes:

- HM Revenue & Customs (HMRC)
- the Health and Safety Executive
- Prudential Regulation Authority
- the Food Standards Agency
- local authorities (LAs) responsible for the enforcement of food standards or health and safety legislation
- the Information Commissioner
- the Environmental Agency
- the Charity Commissioners
- the Director of the Serious Fraud Office
- the Secretary of State for Business, Energy and Industrial Strategy
- the Secretary of State for Transport
- the Pensions Regulator.

The Public Interest Disclosure (Prescribed Persons) (Amendment) Order 2015 came into force on 21 July 2015. This extends, in the field of education, the range of bodies to whom a worker can make a qualifying disclosure.

The whistle-blower is protected if he or she reasonably believes that the subject matter properly falls within the prescribed person's remit, the disclosure is made in the public interest, and that the information and any allegation in the information are substantially true. In June 2014, the Employment Relations Minister announced that individuals can now go directly to their Member of Parliament "if their employer is not responding to their concerns".

Wider Disclosure

Whistle-blowers may disclose information more widely, e.g. to the police, MPs, and non-prescribed regulators. Such a disclosure is protected if:

- it is made in the public interest and not for personal gain (including any payment by the media)
- it is reasonable in all the circumstances
- the whistle-blower reasonably believes that the information and any allegations in it are substantially true.

And in addition, the disclosure fits any one of the following three criteria.

- The disclosure had already been raised internally or with a prescribed person.
- The whistle-blower reasonably believed he or she would have been victimised had he or she raised the matter internally or with a prescribed regulator.
- The whistle-blower reasonably believed a complaint would lead to the evidence being concealed or destroyed and there was no prescribed person.

How the School supports the ability to address concerns

This policy is supported by a detailed Public Interest Disclosure (Whistleblowing) Procedure.

It is recognised and expected that the majority of concerns will be raised openly with managers as part of day-to-day practice and this policy does not seek to undermine this.

As any qualified disclosure needs to be in the 'public interest' the policy cannot be used to raise purely private matters (e.g. in relation to a member's individual contract) or in relation to a grievance which seeks to redress a wrong done to oneself. There are however a number of other appropriate policies and procedures available to staff through which individuals may raise and attempt to resolve such specific concerns, e.g. relating to a grievance, disciplinary, misconduct, or harassment matters.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk

Training

The sharing of concerns policy (includes whistleblowing) is included in the Induction Training when new staff, external staff and volunteers begin working for Eaton House Schools. The policy is also included within their Induction Pack and staff are required to read this and sign the induction procedures form. Staff are also informed that if they have any questions relating to the policies or need help reading or understanding the policies that they can contact HR, the Compliance Manager as well as their line manager. Senior Management complete an e-learning course on Whistleblowing.

Linked Policies

- Whistleblowing Flowchart
- Whistleblowing Procedures

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ATTENDANCE POLICY

This policy applies to Eaton House Schools including EYFS

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Policy Statement

Regular attendance is expected at Eaton House Schools. It is important too, that children arrive and leave school on time. It is equally important that children should not be at school if they are unwell.

Eaton House Schools recognises the importance of developing good patterns of attendance. In building a culture of good school attendance it recognises:

- the importance of good attendance, alongside good behaviour, as a central part of the Schools day to day life;

- the interplay between attendance and wider school improvement efforts, building it into strategies on attainment, behaviour, bullying, special educational needs support, supporting pupils with medical conditions and / or disabilities, mental health issues, safeguarding wellbeing, and support for disadvantaged pupils;

- the importance of setting high expectations for the attendance and punctuality of all pupils and communicating these regularly and effectively to pupils and parents;

- that attendance is never "solved" and is a continuous process requiring revision and updating of messages, processes and strategies; and

- children missing education can act as a vital warning sign to a range of safeguarding issues, including neglect, sexual abuse and child sexual and criminal exploitation.

Children learn best when they are happy, relaxed and focused. All staff show concern and care about each child's welfare.

As attendance is crucial to effective learning and the continuity of learning experiences the school informs the parents of this on joining.

Aims of the Policy

The aims of this policy are as follows:

- to develop and maintain a whole school culture that promotes the benefits of good attendance;
- to ensure, so far as possible, that every pupil in the School is able to benefit from and make their full contribution to the life of the School;
- to prioritise and where possible improve attendance and punctuality across the School, reduce absence and set out the Schools approach to the management of absence / non-attendance;
- to recognise the linkages between attendance / absence and pupil wellbeing, specifically ensuring a consistent whole school approach to safeguarding; and
- to help to promote a whole school culture of safety, equality and protection.

Scope and application

This policy is designed to address the specific statutory obligations on the School to record attendance and absence which applies to the Eaton House Schools including the Early Years Foundation Stage (EYFS).

School responsibility

Eaton House Schools acknowledges that attendance is the essential foundation to securing positive outcomes for all pupils and that everyone has a responsibility to take proactive steps to manage and improve attendance across the wider School community. We consistently promote the benefits of good attendance, setting high expectations for every pupil and consistently communicating those expectations to pupils and parents. Where there are challenges to attendance, the School will work effectively and respectfully with pupils, their families and, where appropriate, local authorities to address them.

The School have robust systems in place to track and record attendance, reasons for absence and patterns at an individual level and by cohorts or groups in order to identify pupils at risk of non-attendance and those who are persistently absent and it will monitor and analyse this data regularly to facilitate early intervention to address issues.

Staff responsibilities

At Eaton House Schools Designated Safeguarding Leads (DSLs) has been appointed as Senior Attendance Champions (SAC) to have overall responsibility for championing and improving attendance in school. The details of SACs are below;

Name	Contact details
Roosha Sue	rsue@ehtm.co.uk
Claire Fildes	cfildes@eatonhouseschools.com
Fiona Bellamy-Laughton	flaughton@eatonhouseschools.com
Paul Russell	prussell@EHTM.co.uk
Brendan O'Keeffe	bokeeffe@eatonhouseschools.com

The Senior Attendance Champions are supported by Data Manager, Hasnain Raza.

The SAC's responsibilities are:

- to set a clear vision for improving attendance in school;
- to establish and maintain effective systems for tackling absence and make sure the systems are followed by all staff;
- to regularly monitor and evaluate progress, including the efficacy of the Schools strategies and processes;
- to have oversight of and analyse attendance data; and
- to communicate clear messages on the importance of attendance to pupils and parents.

Staff with specific responsibilities for attendance:

Class teachers have day to day responsibility for monitoring and promoting good attendance and punctuality. They should:

- have a formal routine for registers being taken accurately each morning and afternoon;
- PA's seek explanations of absences required from pupils on their return to School;

- make enquiries about unexplained absences, including those within the school day, and follow up with pupil to ensure that an explanation has been formally given to the School;
- look out for trends or patterns in a pupil's attendance and inform the SAC of any specific concerns;
- deal with lateness to lessons consistently and promptly;
- consider appropriate sanctions for pupils who arrive late to a lesson in line with the Schools behaviour and discipline policies; and
- discuss non-attendance and / or lateness with pupils and parents (where possible) and emphasise the importance of punctuality and attendance

Monitoring pupil attendance

Attendance will be monitored by Heads, DSLs and form Teachers daily and reviewed half-termly.

We aim to maintain 90% attendance. The School will seek to reduce severe or persistent absence, in accordance with Working Together to Improve School Attendance. The School's strategy when doing so is founded upon the understanding that the child's welfare is paramount, and that respectful and positive relationships between home and school will be the foundation of good attendance; and that the School will be seeking to understand and remove barriers to attendance, together with the parents – particularly where those barriers are complex, for instance for those pupils with long term physical or mental health conditions, or who have special educational needs and disabilities – and any and all relevant pastoral supports will be put in place.

Threshold 1: If attendance falls below 90%, without good reason, the tutor will contact parents/carers as a check in and to ensure there is no additional information we need to be made aware of regarding the pattern of absence.

In addition, on the third day of authorised consecutive absence the form Teacher will contact home to check-in pastorally and to see if there is anything we can do to support the pupil.

Threshold 2: If attendance falls in the range of 80% - 90% the DSL will contact parents/carers to explore the potential reasons for absence and to offer support if needed. The discussions of these meetings are logged on CPOMS.

Threshold 3: If attendance falls below 80% the Head and DSL will decide what intervention, support or external guidance is needed, dependent on pupil and

context/reason for absences and working with each identified pupil and their parents/carers to understand and address the reasons for absence, including any in-school barriers to attendance. Where out of school barriers are identified, the School will signpost and support access to any required services in the first instance. If the issue persists, the School will take an active part in the multi-agency effort with the local authority and other partners and act as the lead practitioner where all partners agree that the school is the best placed lead service. Where the lead practitioner is outside of the school, the School will continue to work with the local authority and partners. The Principal may determine that the pattern of absence is incompatible with the attendance expectations of the school and require the pupil to leave the school.

These steps may be adapted as individual circumstances dictate and serve only as a guide.

Data analysis

We undertake regular data analysis to identify and provide additional support to pupils or pupil cohorts that need it, and to look at historic and emerging patterns across the School and develop strategies to address them. Such analysis may include:

- monitoring and analysing half-termly attendance patterns and trends;
- using this analysis to provide regular attendance reports to Heads to facilitate discussions with pupils and to relevant staff (including the special educational needs coordinator and designated safeguarding lead);
- conducting thorough analysis to identify patterns and trends;
- benchmarking attendance data at whole school, year group and cohort level to identify areas of focus for improvement;
- monitoring the impact of school-wide attendance efforts, including any specific strategies implemented; and
- providing data and reports to the Heads to support their work.

Pupil responsibilities

School attendance is important to pupil attainment, wellbeing and development. The School therefore has high expectations of pupils as to their attendance and has systems in place to reward good attendance and manage poor attendance.

Depending on their age, pupils should be aware that:

- they are expected to be present in-person for the duration of each School day;
- they are expected to arrive on time and attend all timetabled lessons;
- they should not leave a lesson or the School site without permission or otherwise in accordance with School rules;
- they should engage with the Schools arrangements for recording and managing attendance as set out in this policy;
- any unexplained absence will be followed up;
- persistent lateness or non-attendance will result in action being taken by the School. This may take the form of:
  - offers of support to seek to identify and address any barriers to attendance;
  - communication with parents;
  - reporting to other agencies such as children's social care; and
  - sanctions against them or their parents in line with the Schools behaviour policies.

Parents' responsibilities

- Ensuring their children arrive in time for registration
- Signing in at reception if they arrive after registration and signing out if authorised to leave during the school day
- Notifying the school first thing in the morning as close to registration that their child will not be at school and the reason
- Ensuring the school has current contact details in case of an emergency
- Make any application for an authorised leave of absence at the earliest opportunity
- Notify the School of any absence or delay as soon as reasonably possible in accordance with this policy and when doing so, give an accurate explanation for this; and
- cooperate with the School to explore possible barriers to attendance and to improve it where attendance has been raised as an issue.

Additional needs

Some pupils may find it harder than others to attend School, and will work with those pupils and parents to try to remove barriers to attendance by building strong and trusting relationships and working together to put the right support in place.

We will make reasonable adjustments where a pupil has a disability that puts them at a substantial disadvantage, in comparison with pupils without a disability, in relation to school attendance.

We will also work with parents, and where appropriate with the local authority, to develop specific support approaches for attendance for pupils with special educational needs and disabilities e.g. ensuring the provision outlined in a pupils education, health and care plan is accessed.

Suitable strategies will also be considered for pupils with any social, emotional or mental health issue that is affecting their attendance. Where barriers are outside of the Schools control, the School will work with parents and pupils to identify alternative sources of support or consider, where appropriate, making a referral for early help.

Sickness Return

Eaton House Schools will make a sickness return to the local authority if a pupil is recorded in the attendance register as absent using the national absence **code I** (unable to attend because of sickness) and there are reasonable grounds to believe that the pupil will have to miss 15 consecutive school days or more for illness or the pupil's total number of school days missed during the current school year because of illness (whether consecutive or cumulative) will reach or exceed 15 school days.

Communication

Parents are informed of the importance of being at school on time and notifying the class teacher if their child is absent and report to the PA's if they are late.

If a pupil is absent from school, then this must be recorded. Requests for leave for medical reasons should be made to the form teacher. Pupils are not normally permitted to have leave for other reasons during school time. Any requests for such leave must be in writing to the Head Teacher. Pupils are not permitted to be absent from school without the Head Teacher's consent.

Pupils and parents are informed that if they are late to school, they must report to the PA's on arrival. All information regarding absence is passed on to the form teacher and duly recorded in the register. If no notification is received about the child's absence this will be added into the register as unauthorised absence. The PA will contact the parent/guardian to find out where and why the pupil is absent and update the register.

Truancy

All the staff at Eaton House Schools are concerned about children's regular attendance, and the importance of continuity in each child's learning. They are also concerned about each child's safety, welfare and happiness. Although it is unlikely that a child may truant, if there is a concern, appropriate action should be taken immediately.

If truancy is suspected, the Head Teacher is notified, who will then contact the parents by phone. Parents are encouraged to bring their child to school. Reasons for the child not wanting to attend can be discussed and hopefully resolved.

Recording and managing attendance

Each form is registered on the register section of the iSAMS electronically. Registers are taken in the morning and afternoon as below;

Eaton House the Manor	Attendance register taken by
Nursery	09:10 and 12:30
Girls	08:45 and 13:15
Pre-Prep	08:45 and 13:10
Prep	08:45 and 14:00
Eaton House Belgravia	**Attendance register taken by**
Nursery	08:50 and 13:45
Pre-Prep	08:50 and 13:45
Prep	08:50 and 13:45

Reporting duties

The School has statutory reporting obligations if a pupil fails to regularly attendance their absence is unauthorised. The School must report unauthorised absences for a continuous period of 10 days or more to the local authority.

- In the event that a pupil holding a Student or Child Student visa sponsored by the School goes missing, the School will report to UKVI if the pupil misses ten consecutive expected contact points.

- Each time the Schools attendance register is completed it is treated as a contact point for these purposes.

- The report will be made by the Schools Level 1 user via the Sponsor Management and in accordance with prevailing UKVI guidance

Admissions Register

- In accordance with the requirements of the School Attendance (Pupil Registration) (England) Regulations 2024 the School will:

    o   Maintain an admission register of all pupils admitted to the School (also known as the school roll); and

    o   Inform the local authority of any pupil who is going to be added to or deleted from the Schools admission register at non-standard transition points.

- The admission register must be kept electronically and a back-up copy of the register is made at least once a month in the form of an electronic or printed copy.

- The School must ensure that every entry in the Schools admission register is preserved for six years beginning with the day on which the entry was made; and every back-up copy of the register is preserved for six years after the end of the school year that it relates to.

- The admissions register contains specific personal details of every pupil in the School, including their date of admission, information regarding parents and carers and details of the school they last attended

- Where the School notifies the local authority that the pupil's name is to be deleted from the admission register, the School must provide it with the following information:

    (a)   the full name of the pupil;

    (b)   the address of the pupil;

    (c)   the full name and address of any parent the pupil normally lives with;

    (d)   at least one telephone number of any parent with whom the pupil lives or can be contacted in an emergency;

    (e)   the pupil's future address, the full name and address of the parent who the pupil is going to live with, and the date the pupil is expected to start living there, if applicable;

    (f)   name of the pupil's other or future school and pupil's start date or expected start date there, if applicable;

    (g)   the ground (prescribed in regulation 9) under which the pupil's name is to be deleted from the admission register.

Attendance register

- Eaton House Schools records and monitors the attendance of all pupils in accordance with the School Attendance (Pupil Registration) (England) (Regulations) 2024.

- The School uses the appropriate national attendance and absence codes system to enable it to record and monitor attendance and absence in a consistent way.

- The attendance register is kept electronically and a back-up copy of the register is made at least once a month in the form of an electronic or printed copy and every entry in the Schools admission register is preserved for six years beginning with the day on which the entry was made; and every back-up copy of the register is preserved for six years after the end of the school year that it relates to.

- The School will also use these records to identify patterns of poor attendance (at individual and cohort level) and work with pupils and parents to resolve any issues before they become entrenched.