

SAFEGUARDING POLICY



HARROW
INTERNATIONAL
BENGALURU

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Designated Safeguarding Lead (DSL)

Ms Rohini Malhotra

Deputy Designated Safeguarding Lead (DDSL)

Mr John Prem (Head of Administration and Operations)

POLICY STATEMENT AND PRINCIPLES

- Harrow International School Bengaluru takes a whole-School approach to safeguarding and child protection and this will be at the forefront and underpin all relevant aspects of process and policy development at the School.
- This policy applies to all students in the School. Any student, whether under or over the age of 18, will be regarded as a child for the purpose of this policy.
- All members of staff have a responsibility for the implementation of this policy.
- Any concerns regarding child protection and/or safeguarding must be reported immediately to the Designated Safeguarding Lead (DSL) or, in their absence, to the Deputy Designated Safeguarding Lead (DDSL).
- All staff should be alert to identifying children who may benefit from early help.
- If a crime has been committed, it should be reported to the police.
- All staff must know who the trained DSL and DDSL are.
- All concerns of a safeguarding or child protection nature must be treated in the utmost confidence.
- Where there is a safeguarding concern, the Governing Body and SLT should always ensure that a student's wishes and feelings are taken into account when determining what action to take and what services to provide. Children and young people should know that their concerns will be treated seriously and that they can safely express their views.

INTRODUCTION

Harrow Bengaluru recognises that it has a duty to ensure that safeguarding permeates all activities and functions and expects all members of staff, volunteers and other third parties to share its commitment to safeguarding and promoting the welfare of children. Adults at Harrow Bengaluru take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them.

THE SCHOOL'S CORE SAFEGUARDING PRINCIPLES

- The School's responsibility to safeguard and promote children's welfare is paramount.
- It is everyone's responsibility to safeguard children. Everyone who comes into contact with children and their families has a role to play in keeping children safe.
- Safer children make more successful learners.
- The School's Safeguarding Policy will be reviewed at least annually by the DSL and by the Governors

TERMINOLOGY

Safeguarding and promoting the welfare of children refers to the process of protecting children from maltreatment, preventing the impairment of children's mental and physical health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and taking action to enable all children to have the best outcomes.

Child protection refers to the processes undertaken to protect children who have been identified as suffering or being at risk of suffering significant harm.

Members of staff refers to all those working for or on behalf of the School, full time or part time, temporary or permanent, in either a paid or voluntary capacity.

CONTEXTUAL SAFEGUARDING

In order to help prevent and tackle child-on-child abuse, the School understands the value of contextual safeguarding. Contextual safeguarding is an approach to understanding and responding to children's experiences of significant harm beyond their families. It recognises that the different relationships that children form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers sometimes have little influence over these contexts, and children's experiences of extra-familial abuse can undermine parent-child relationships. Therefore, safeguarding practitioners need to engage with individuals and sectors who do have influence over/within extrafamilial contexts, and recognize that assessment of, and intervention with, these spaces is a critical part of safeguarding practices.

Contextual safeguarding, therefore, expands the objectives of child protection systems in recognition that children are vulnerable to abuse in a range of social contexts. Child includes everyone under the age of 18. However, the School's duty to promote welfare and health and safety applies to all the students in its care whether they are under or over the age of 18.

Parent refers to birth parents and other adults who are in a parenting role, for example step-parents, guardians, foster carers and adoptive parents.

SAFEGUARDING STATEMENT

Harrow International School Bengaluru fully recognises its moral and statutory responsibility to safeguard and promote the welfare of all its students. The School endeavours to provide a safe and welcoming environment where students are respected and valued. Members of staff should be alert to the signs of abuse and neglect and follow procedures to ensure that students receive effective support, protection and justice.

The procedures contained in this policy apply to all staff, Governors, volunteers and visitors.

SAFEGUARDING IN HARROW SCHOOL

This includes:

- ensuring students' health and safety;
- referring concerns or allegations about a child to the appropriate authority promptly;
- preventing bullying;
- preventing all forms of abuse;
- preventing harassment and discrimination;
- use of physical intervention;
- meeting the needs of pupils with medical conditions;
- an awareness of the link between mental health and safeguarding;
- provision of first aid and medical support;
- preventing alcohol, drug and substance misuse;
- educational visits;
- intimate care;
- e-safety;
- issues specific to the local area (for example road safety)
- School security.

GUIDING PRINCIPLES

- The welfare of the child is paramount.
- All children, regardless of age, gender, ability, culture, race, language, religion, sexual identity, caste, class, skin colour, ethnicity, hair texture and linguistic identity have equal rights to protection.
- All members of staff have equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm.
- Students and staff involved in child protection issues will receive appropriate support.

POLICY AIMS

- To provide all members of staff with the necessary information to enable them to meet their safeguarding and child protection responsibilities;
- To ensure consistent good practice;
- To demonstrate the School's commitment with regard to child protection to students, parents and other partners.

THE SCHOOL'S COMMITMENT

The School adopts an open and accepting attitude towards students as part of its responsibility for pastoral care. We hope that students and parents will feel free to talk about any concerns and see the School as a safe place when there are difficulties. Students' worries and fears will be taken seriously. Students are encouraged to seek help from members of staff.

Harrow Bengaluru will therefore:

- establish and maintain an ethos where students feel secure, are encouraged to talk, and are listened to;
- ensure that students know that there are adults in the School whom they can approach if they are worried or are in difficulty;
- include in the curriculum activities and opportunities that equip students with the skills needed to stay safe from abuse and which will develop resilience and realistic attitudes to the responsibilities of adult life;
- ensure every effort is made to establish effective working relationships with parents and colleagues from other agencies;
- operate safer recruitment procedures and make sure that all appropriate checks are carried out on new staff and volunteers who will work with the students; and
- ensure that all members of staff are aware of how and when to act on concerns that they have and work in a safe and appropriate manner at all times.

CONFIDENTIALITY

The School recognises that all matters relating to child protection are sensitive and confidential. The Head Master or the DSL will share that information on a 'need to know, what and when' basis. Concerns about individuals should never be discussed elsewhere, inside or outside the School, unless in confidential meetings for that purpose.

Members of staff are expected to manage the requirement to maintain an appropriate level of confidentiality while at the same time liaising with relevant professionals such as the DSL. Members of staff should never promise a student that they will not tell anyone about an allegation, as this may not ultimately be in the best interests of the child.

CHILD PROTECTION PROCEDURES

All members of staff have a responsibility to identify the symptoms and triggers of abuse and neglect, to share information and to work together to provide children and young people with the help they need. Members of staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.

When concerned about the welfare of a student, staff members should always act in the best interests of the child.

The School will act on identified concerns and provide early help to prevent concerns from escalating. If a student is in immediate danger or is at risk of harm, in consultation with the DSL/DDSL, a referral may be made to the police immediately. The School will ensure it provides as much information as possible as part of the referral process to allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

RECOGNISING ABUSE

To ensure that students are protected from harm, it is important to understand what types of behaviour constitute abuse and neglect. All members of staff should be aware that abuse, neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. 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.

There are four principal categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect.

PHYSICAL ABUSE

A form of abuse that may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

EMOTIONAL ABUSE

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

SEXUAL ABUSE

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

NEGLECT

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

INDICATORS OF ABUSE

It is the responsibility of all members of staff to report any and all niggling worries or concerns over safeguarding and welfare. It is not their responsibility to investigate or decide whether a student has been abused. A child who is being abused or neglected may:

- have bruises, bleeding, burns, fractures or other injuries;
- show signs of pain or discomfort;
- keep arms and legs covered, even in warm weather;
- be concerned about changing for PE or swimming;
- look unkempt and uncared for;
- change their eating habits;
- have difficulty in making or sustaining friendships;
- appear fearful;
- be reckless with regard to their own or others' safety;
- self-harm;
- show other signs of deterioration in mental health;
- show signs of not wanting to go home;
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn;

- challenge authority;
- become uninterested in their school work;
- be constantly tired or preoccupied;
- be wary of physical contact;
- be involved in, or particularly knowledgeable about, drugs or alcohol;
- display sexual knowledge or behaviour beyond that normally expected for their age; or
- be showing signs of being drawn into anti-social or criminal behaviour.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed. It is therefore essential that members of staff report their concerns. Staff do not need 'absolute proof' that a student is at risk but should act on any hunches or worries in the knowledge that they will be supported in their safeguarding role. Reports made in good faith will always be dealt with in accordance with the School's Whistleblowing Policy, regardless of outcome.

All members of staff should have awareness of safeguarding issues in the broad. In particular, they should know that behaviours linked to drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth-produced sexual imagery) put children in danger.

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. It can be committed by parents, or other family members; by people known but not related to the victim; and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns among children and parents, for example people loitering nearby or unknown adults engaging children in conversation. Incidents of this type should be reported to Harrow Bengaluru Security.

Students are given advice on how to keep themselves safe as part of the PSHE programme.

CHILD CRIMINAL EXPLOITATION

Child criminal exploitation (CCE) is where an individual or group takes advantage of an imbalance in power to coerce, control, manipulate or deceive a child into any form of criminal activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals (particularly older children), and they are not treated as victims despite the harm they have experienced. The victim may have been criminally exploited even if the activity appears consensual.

CCE does not always involve physical contact; it can also occur through the use of technology.

Children can become trapped by this type of exploitation because perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional wellbeing;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

CHILD SEXUAL EXPLOITATION

Child sexual exploitation (CSE) is a form of sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. The victim may have been sexually exploited even if the sexual activity appears consensual.

CSE may involve physical contact such as assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It can also occur solely through the use of technology. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse via the internet. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media. Some children may not realise they are being exploited, for example they believe they are in a genuine romantic relationship. A significant number of children who are victims of exploitation go missing from home, care and education at some point.

Some of the following signs may be indicators:

- children who appear with unexplained gifts, money or new possessions;
- children who have associations with gangs and/or are isolated from their peer networks;
- children who associate with other young people involved in exploitation;
- children who have older girlfriends or boyfriends or controlling individuals;
- children who suffer from sexually transmitted infections or become pregnant, display evidence of physical or sexual abuse or who behave in an excessively sexualised manner for their age;
- children who suffer from changes in emotional wellbeing or display signs of self-harm;
- children who misuse drugs or alcohol;
- children who frequent areas known for sex work;
- children who display increasing secretiveness or concerning use of the internet;
- children who receive excessive texts/phone calls;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

CSE can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking. All members of staff are made aware of the indicators of sexual exploitation in their safeguarding training and any concerns should be reported immediately to the DSL.

MENTAL HEALTH

All staff should be aware that mental health problems can, in some cases, be an indicator that a student has suffered, or is at risk of suffering, abuse, neglect or exploitation. When students have suffered abuse and/or neglect or other traumatic experiences, staff should be aware that this can have a lasting impact on their mental health, behaviour and education. Only appropriately trained professionals should attempt to diagnose mental health conditions. Other staff are, however, well placed to observe students day to day and to identify those whose behaviour suggests that they may be experiencing or be at risk of developing a mental health problem. Any member of staff who has a concern about the mental health of a student that might also be a safeguarding concern should speak to the DSL or a DDSL straight away.

CHILD-ON-CHILD ABUSE

Harrow Bengaluru has a zero tolerance and whole-School approach to child-on-child abuse. Consequently, it seeks to educate all governors, staff, volunteers, parents and students about the issue.

All members of staff should:

- be aware that children can abuse other children;
- be aware that this can happen both inside and outside School and online, sometimes involving pupils at other schools;
- be aware that it is more likely that girls will be victims and boys perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously;
- recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports;
- understand that even if there are no reports in their school it does not mean it is not happening, it may just be that it is not being reported;
- speak to the DSL (or a DDSL) straight away if they have any concerns regarding potential child-on-child abuse;
- understand the importance of challenging inappropriate behaviours between children as such behaviours can actually be abusive in nature;
- avoid downplaying certain behaviours, for example dismissing sexual harassment as "just banter" or "just having a laugh" as this can lead to a culture of unacceptable behaviours, an unsafe environment for students and, in worst case scenarios, a culture that normalises abuse, leading to students accepting it as normal and not coming forward to report it; and
- be able to reassure victims that they are being taken seriously and that they will be supported and kept safe.

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

Child-on-child abuse may take different forms, such as:

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

All staff should be clear regarding the School's policy and procedures for dealing with incidents of child-on-child abuse and the important role that they must play both in preventing it and responding to it.

If a member of staff thinks for whatever reason that a student may be at risk of or experiencing abuse by their peer(s) or that a student may be at risk of abusing or may be abusing their peer(s), they should discuss their concern with the DSL without delay so that a course of action can be agreed.

If a student speaks to a member of staff about child-on-child abuse that they have witnessed or that they are a part of, the member of staff should listen to the student and use open language that demonstrates understanding rather than judgement. As above, they should then discuss their concern with the DSL without delay so that a course of action can be agreed.

Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Students are able freely to report instances of child-on-child abuse through any of the full range of pastoral support mechanisms in place at the School, including (but not limited to) House Masters/Mistresses, Assistant House Masters/Mistresses, Matrons/Wardens, medical staff, counselling staff and senior students. All such reports will be taken seriously, investigated and recorded centrally using the School's pastoral management systems. The School will work to put in place appropriate support for all those involved – victims, perpetrators and any other students affected.

ALLEGATIONS AGAINST PUPILS

A student against whom an allegation of a child protection nature has been made may be suspended from the School during the investigation. The School's policy on behaviour, discipline and sanctions will apply. The School will follow advice on the investigation of such allegations and will take appropriate action to ensure the safety and welfare of all pupils involved, including the student or students accused of abuse. If it is necessary for a student to be interviewed by the police or other authorities in relation to allegations of abuse, the School will ensure that, subject to advice from external agencies, parents are informed as soon as possible, and that the student is supported during the interview by an appropriate adult.

SEND

Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children, who can be perpetrators as well as victims of abuse and neglect.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges.

Well-judged pastoral support and attention for these students is essential, along with ensuring any appropriate support for communication is in place. The DSL liaises closely and directly with the Head of Learning Skills regarding all students with SEND at Harrow.

SERIOUS VIOLENCE

Staff should be aware of the indicators that may signal that children are at risk from, or are involved with, serious violent crime. These may include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or excluded from School, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Staff should share their concerns immediately with the DSL if they suspect such involvement.

SEXUAL VIOLENCE AND SEXUAL HARASSMENT BETWEEN CHILDREN

The School adopts a zero-tolerance approach to sexual violence and sexual harassment.

It recognises that:

- schools must protect any adult students (i.e. aged 18 and above) and engage with the authorities as required;
- members of staff need to choose terminology carefully (for example the use of 'victim' and 'perpetrator') on a case by case basis;
- a student abusing another student may have been abused themselves and may also need support;
- sexual violence and sexual harassment can be driven by wider societal factors such as everyday sexist stereotypes and everyday sexist language;
- sexual violence and sexual harassment can happen both in and out of School as well as online, and often occurs in a mixture of environments;
- the scale of the problem is considerable and has probably been underestimated;
- sexual assault can result in a range of health needs, both mental and physical, including unwanted pregnancy;
- students might not find it easy to talk about their abuse verbally so might not tell staff about abuse; it may be that staff overhear a conversation regarding the abuse or a student's behaviour changes etc.;
- the definition of 'consent', including reference to an individual having the 'freedom and capacity to choose', needs to be included in the School's curriculum;
- all members of staff, particularly the DSL, need to adopt a contextual safeguarding approach to incidents, which involves considering the context in which incidents or behaviours occur;
- assessments of students need to consider wider environmental factors present in a child's life that are a threat to their safety or welfare;
- information sharing is important, especially where students involved in allegations of sexual violence or sexual harassment attended two or more different schools or colleges;
- in cases where police will not take further, the School will continue to engage with specialist support for the victim (and perhaps also for the perpetrator), as required;
- issues and actions are regularly reviewed in order to ascertain patterns of behaviour and to look for further ways to improve procedures and practices; and
- how a School responds to an incident will impact future victims of sexual violence or sexual harassment.

There are four likely routes to consider when managing a report of sexual violence or sexual harassment:

- Managing internally: in some cases of sexual harassment (such as one-off incidents) the School may manage the incident internally;
- Early help: this is particularly useful in addressing non-violent, harmful sexual behaviour and may prevent escalation;
- Referrals to outside agencies: in cases where there has been harm, or there is an immediate risk, a referral will be sought;

- reporting to police: in cases where rape, assault by penetration or sexual assault is reported, the School will not wait for the outcome of a police investigation before protecting the victim, perpetrator and other students in the School. The DSL will work closely with the police to ensure that the School's actions do not jeopardise the police investigation. If a student is convicted or cautioned, the School will carry out a risk assessment and consider suitable action.

Note: It is important for schools to ensure that the victim and perpetrator(s) remain protected, especially from bullying and harassment. Whatever the outcome of an incident, the School will continue to support both the victim and perpetrator, as appropriate. Records will be kept of concerns, discussions and decisions made, and the reasons for those decisions.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL should consider whether the student who made the allegation is in need of help or may have been abused himself by someone else. If a report is shown to be deliberately invented or malicious, the School will consider whether any disciplinary action is appropriate against the individual who made it.

BULLYING

The School's Counter-Bullying Policy should be read alongside this document. Bullying is one form of child-on-child abuse. While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child's wellbeing and has even featured in the suicide of some young people. Members of staff should be aware of the harm caused by bullying and must use the School's counter-bullying procedures when necessary. In some situations, a student's behaviour may warrant a response under child protection rather than or as well as counter-bullying procedures. All incidences of bullying, including cyber-bullying and prejudice-based and discriminatory bullying, should be reported.

CONCERNS ABOUT A STUDENT'S WELFARE

All members of staff should be able to distinguish between a safeguarding concern about a child and a child who is in immediate danger or at significant risk of harm. There will be occasions when a member of staff may suspect that a student may be at risk but have no 'real' evidence. The student's behaviour may have changed, his actions may reveal confusion or distress, or physical but inconclusive signs may have been noticed. In these circumstances, the member of staff must try to give the student an opportunity to talk. The signs they have noticed may be due to a variety of factors. It is fine for a member of staff to ask the student if he is okay, or if he/she can help in any way. Members of staff should report their concerns to the student's House Master/Mistress. If the student starts to reveal that he is being (or has been) harmed, members of staff should follow the advice below. Following an initial conversation with the student, if the member of staff remains concerned, he/she should discuss their concerns with the DSL or with one of the DDSLs.

IF A STUDENT MAKES A DISCLOSURE

It takes courage for a student to disclose that they have been or are being abused. They may feel ashamed, particularly if the abuse is sexual. The abuser may have made threats about what will happen if they tell. The student may have lost trust in adults, or he may believe, or have been told, that the abuse is their own fault.

During such conversations with the student, members of staff will:

- allow the student to speak freely;
- remain calm and avoid overreaction;
- offer reassurance and general words of comfort (rather than physical touch);
- not be afraid of pauses or silences;
- not ask investigative or leading questions;
- explain at an appropriate time that, in order to help, the information must be passed on to relevant people in positions of responsibility;
- not reprimand the student for failing to disclose earlier;
- establish next steps (agree to go to see his House Master/Mistress or the DSL) but let the student know that someone will come to see them before the end of the day;
- report verbally to the DSL, even if the student has promised to do it by himself;
- write up the conversation as soon as possible as a record of concern; and
- seek support, if distressed.

NOTIFYING PARENTS

The School will normally seek to discuss any concerns about a student with their parents. This must be handled sensitively. The School will contact parents in the event of a concern, suspicion, or disclosure. However, if the School believes that notifying parents could increase the risk to the student or exacerbate the problem, advice will first be sought.

YOUTH-PRODUCED SEXUAL IMAGERY (SEXTING)

This refers to the consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth-produced sexual imagery). Any incident involving youth-produced sexual imagery should immediately be reported to the DSL.

CONFIDENTIALITY AND SHARING INFORMATION

Staff should never promise confidentiality as it is very likely that it will be in the best interests of the victim to seek advice and guidance from others in order to provide support. All staff will understand that child protection issues warrant a high level of confidentiality, not only to respect any students or staff involved but also to ensure that information released into the public domain does not compromise evidence. Members of staff should only discuss concerns with the DSL or a DDSL, the Head Master, Deputy Head Master or Chair of Governors (depending on whom the subject of the concern is). That

person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

ROLES AND RESPONSIBILITIES

Everyone who encounters our students and their families has a role to play in safeguarding children. We place a high priority on identifying concerns early and provide help for the students to prevent concerns from escalating. We do this because we are aware that we play a vital role in the wider safeguarding system for children. Together with our colleagues in the police, health and other children's services, we promote the welfare of children and protect them from harm. Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. All our members of staff are aware that teachers, including head teachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties. These standards also apply to trainees, inductees and newly qualified teachers and we fully adhere to these standards, applying the School's disciplinary procedures, where appropriate, in cases of misconduct.

THE DESIGNATED SAFEGUARDING LEAD (DSL):

- is the Director of Safeguarding and is responsible for safeguarding and child protection at Harrow Bengaluru, including online safety;
- has the status and authority within the School to carry out the duties of the post, including committing resources and supporting and directing other staff;
- may not be a member of the Senior Management Team but has immediate access to that Team and the Head Master, can delegate activities to appropriately trained deputies, but cannot delegate the ultimate lead responsibility for child protection;
- manages referrals from School staff or any others from outside the School;
- acts as a source of support and expertise to the School community;
- encourages a culture of listening to students and taking account of their wishes and feelings;
- is alert to the specific needs of children in need or those with Special Educational Needs;
- has a strong knowledge of Harrow Bengaluru safeguarding procedures;
- has an understanding of locally agreed processes for providing early help and intervention;
- keeps detailed written records of all concerns, ensuring that such records are stored securely and flagged on, but kept separate from the student's general file;
- when students leave the School, ensures the child protection file is copied for any new school as soon as possible but transferred separately from the main pupil file;
- develops effective links with relevant statutory and voluntary agencies;
- confirms that all staff have they have read and understood the school's Safeguarding Policy;
- ensures that mechanisms are in place to help staff understand and discharge their responsibilities thereunder;
- ensures that the Safeguarding Policy is annually reviewed by the Governing Body;
- liaises with the Governing Body and the Head Master as appropriate;
- ensures that a record of staff attendance at child protection training is kept;
- makes the Safeguarding Policy available publicly;

- in the Head Master's absence, ensures cases concerning a member of staff are referred appropriately
- submits a termly report to the Governing Body about how the School's duties have been carried out.
- during term time will be in School during school hours or, if not, will ensure that one of the DDSLs is in School.
- Outside school hours, the DSL and DDSLs will be available by phone.

DEPUTY DESIGNATED SAFEGUARDING LEADS (DDSLs):

- are appropriately trained in safeguarding;
- In the absence of the DSL, carry out those functions necessary to ensure the on-going safety and protection of the student;
- have the status and authority within the School to carry out the duties of the post, including committing resources and supporting and directing other staff; and
- in the event of the long-term absence of the DSL, the DDSLs will assume all the functions as for the DSL above.

THE GOVERNING BODY:

- will conduct a review of safeguarding and child protection policies and the effectiveness of their implementation at least annually;
- will ensure that the School has a Designated Safeguarding Lead (DSL) and a Deputy Designated Safeguarding Lead (DDSL), whose roles are explicit in the role holder's job description;
- will ensure that the School has a safeguarding policy and safeguarding procedures, including a Staff Code of Conduct;
- will ensure that the School's Safeguarding Policy and procedures are made available publicly;
- will ensure that the School has procedures for dealing with allegations of abuse made against members of staff, including allegations made against the Head Master and allegations against other children;
- will ensure that the School follows safer recruitment procedures that include statutory checks on staff suitability to work with children;
- will ensure that the School develops a training strategy that ensures all staff, including the Head Master, receive information about the School's safeguarding arrangements on induction and appropriate child protection training, which is regularly updated (at least annually);
- will ensure that the School makes all temporary staff and volunteers aware of the School's arrangements for child protection;
- will ensure that the School provides a co-ordinated offer of early help when additional needs of student are identified;
- will ensure that the School considers how students may be taught about safeguarding, including online, as part of a broad and balanced curriculum;
- will take decisive action to implement a comprehensive whole-school approach to online safety, ensuring it includes a clearly defined policy on the use of mobile technology within the school;

- will address and rectify without delay any deficiencies or weaknesses in the School's Safeguarding Policy and procedures, which are brought to the attention of the Governing Body.

THE HEAD MASTER:

- ensures that the Safeguarding Policy and procedures are implemented and followed by all staff;
- allocates sufficient time, training, support and resources, including cover arrangements when necessary, to enable the DSL and DDSL(s) to carry out their roles effectively, including the assessment of children and attendance at strategy discussions and other necessary meetings;
- ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistleblowing procedures;
- ensures that students are provided with opportunities throughout the curriculum and in PSHE Education to learn about safeguarding, including keeping themselves safe online;
- oversees the procedure where an allegation is made against a member of staff or of the Governing Body.

THE PASTORAL COMMITTEE

The Pastoral Committee is chaired by the Boarding Coordinator, and comprises additionally the Behaviour Coordinator, the Curriculum Director, a Senior House Master, a Senior House Mistress, the chair of the Students' Pastoral Committee, the Head of Learning Skills, the Head of PSHEE, the School Doctor, the Senior School Nurse and a representative from the Matrons/Wardens.

The Pastoral Committee meets twice a term to develop the School's pastoral strategy and advises the Head Master on matters of pastoral policy.

THE SAFEGUARDING COMMITTEE

The Safeguarding Committee is chaired by the DSL and meets at least once a week to review and to triage cases for further work as necessary.

The Safeguarding Committee will comprise the DSL, the Head Master and the DDSL. Additional representatives may be added at the discretion of the Committee Chair.

The Safeguarding Committee:

- will help to co-ordinate arrangements for the longer-term protection and support of each student who has made allegations of abuse, or is alleged to have suffered from abuse, taking their wishes into account;
- will make arrangements, where feasible and appropriate, for any student who has been the subject of abuse to receive necessary counselling and support by agreement with his parents;
- will support any student who is subject to a Medical Care Plan;
- will review any students who are considered at high risk of harm, and
- will ensure, through the relevant House Master/Mistress, that appropriate support and safeguards are in place for all such students.

RESIDENTIAL BOARDING STAFF

All residential staff, principally House Masters/Mistresses, Matrons/Wardens and Assistant House Mistresses/Masters, will receive additional training in pastoral care and safeguarding, as it is recognized that they are likely to be on the frontline in terms of safeguarding and child protection. House Masters/Mistresses, Assistant House Mistresses/Masters and Matrons/Wardens will report all child protection and safeguarding concerns immediately to the DSL.

SENIOR STUDENTS IN POSITIONS OF RESPONSIBILITY

Senior students who hold positions of responsibility over other students (for example School or House Prefects) will be briefed before they assume office on appropriate action to take should they have concerns of a safeguarding nature or receive any allegations of abuse. School Prefects will receive additional on-going support and training from members of the Pastoral Committee during the course of the academic year.

SCHOOL DOCTORS AND MEDICAL CENTRE STAFF

School nurses will liaise closely with the School doctors, the DSL, and other members of the School's safeguarding team. The School doctors will have their own obligations to report the same, either to the Head Master or DSL. Medical Centre staff will be invited to participate in any School INSET concerned with the welfare and protection of students.

MISSING STUDENTS

The School will follow its robust procedures for registration and attendance to ensure the safety of the students and to carry out its duty of care. The School recognises that a child going missing from education could be a potential indicator of abuse or neglect, including sexual abuse and sexual exploitation. Therefore, members of staff will respond promptly to absences and follow the School's Missing Student procedures as appropriate. The DSL, through the House Masters/Mistresses, will monitor any unauthorised absence at the start or end of any leave period, and will be particularly cautious if a student goes missing on repeated occasions. Whenever possible, the School holds more than one emergency contact number for its pupils.

HELPING STUDENTS TO KEEP THEMSELVES SAFE

Students are taught to understand and manage risk through numerous programmes, for example counter-bullying workshops, the PSHEE programme for all year groups, training in Peer Mentoring, lectures and seminars and through all aspects of their life at the School.

Students are encouraged to think about risks they may encounter and to work out how such risks can be overcome. These discussions are empowering and enabling. They aim to promote sensible behaviour rather than fear or anxiety.

Students are also regularly reminded about e-safety and counter-bullying procedures. The School continually promotes an ethos of care and respect for others.

Students are encouraged to speak to a member of staff in confidence about any worries they may have. The School conducts an annual survey, which helps to inform pastoral strategy as well as shedding light upon areas of concern or specific trends in behaviour.

SUPPORT FOR THOSE INVOLVED IN A CHILD PROTECTION ISSUE

Child abuse is devastating for the child. It can also result in distress and anxiety for members of staff who become involved. The School will support students, their families, and staff by:

- taking all suspicions and disclosures seriously;
- nominating a link person (normally the DSL or a DDSL) who will keep all parties informed and be the central point of contact;
- responding sympathetically to any request from students or staff for time out to deal with distress or anxiety;
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies;
- storing records securely;
- offering counselling or other avenues of internal or external support;
- following the procedures laid down in our whistleblowing, complaints and disciplinary procedures;

ALLEGATIONS OR CONCERNS RELATING TO STAFF

Allegations and concerns will be dealt with in accordance with safeguarding procedures and practice guidance. When an allegation is made against a member of staff or a concern expressed about their conduct relating to children, set procedures must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.

A member of staff who is concerned about the conduct of a colleague towards a student is placed in a difficult situation. He or she may worry that they have misunderstood the situation and will wonder whether a report could jeopardise a colleague's career. However, all members of staff must remember that the welfare of the child is paramount. No member of staff will suffer a detriment for raising a genuine concern. The School's Whistleblowing Policy enables members of staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place.

Members of staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently, and to be kept informed of its progress. Suspension is not the default option and alternatives to suspension will always be considered. In some cases, a member of staff may be suspended where this is deemed the best way to ensure that children are protected.

Harrow Bengaluru adopts a whole-School approach to safeguarding. As such, it seeks to ensure that there is an open and transparent culture in which all concerns about any adults working in any capacity (employed or voluntary) on behalf of the School are dealt with promptly and appropriately. Creating a culture in which all concerns about adults are shared responsibly with the right person, recorded and dealt with appropriately, is critical. This should enable the School to identify concerning, problematic or inappropriate behaviour early, thus minimising the risk of abuse and ensuring that adults working in or on behalf of the School are clear about professional boundaries and the ethos and values of the School. It should also protect those working in or on behalf of the School from potential false allegations or misunderstandings.

WHAT IS A LOW-LEVEL CONCERN? The term 'low-level concern' does not mean that it is insignificant. 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.

Examples of low level concerns could include, but are not limited to:

- being over-friendly with children;
- having favourites;
- engaging with a child on a one-to-one basis in a secluded area; or
- using inappropriate sexualised, intimidating or offensive language.

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. Harrow Bengaluru aims to:

- ensure that its staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, both in themselves and in others;
- empower staff to share any low-level safeguarding concerns;
- address unprofessional behaviour and support the individual to correct it at an early stage;
- provide a responsive, sensitive and proportionate handling of such concerns when they are raised;
- help identify any weakness in the School's safeguarding systems.

SHARING LOW-LEVEL CONCERNS

Low-level concerns about a member of staff (or person employed by a contractor or agency) should be reported to the DSL.

The School seeks to create an environment in which staff are encouraged and feel confident to self-refer where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, or in which their own behaviour might have fallen below expected professional standards.

Reports about low level concerns relating to supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

RECORDING LOW-LEVEL CONCERNS

All low-level concerns should be shared by the DSL with the Head Master and recorded, with details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted; if the individual wishes to remain anonymous, then that should be respected as far as reasonably possible. The School must keep these records confidential. Records should be reviewed periodically 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 or behaviour moves from a concern to meeting the harms threshold, through appropriate escalation. Consideration will also be given to whether there are wider cultural issues within the School that enabled the behaviour to occur and, where appropriate, policies could be revised, or extra training delivered to minimise the risk of it happening again. The School will retain information on low-level concerns at least until the individual leaves its employment.

REFERENCES

Only substantiated safeguarding allegations will be included in staff references. Low-level concerns will not be included unless they relate to issues that would normally be included in a reference, such as misconduct or poor performance. Low-level concerns relating exclusively to safeguarding (and not to misconduct or poor performance) will therefore not be referred to in a reference.

STAFF TRAINING

All members of staff at the School will receive appropriate training in safeguarding and child protection, which is regularly updated. In addition, all members of staff will receive safeguarding and child protection updates at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

In order that the school community is aware of and compliant with local protocols, all members of staff shall have a thorough understanding of the Counter Bullying Protocol, the Child Safeguarding & Protection Policy of the School, POCSO (Protection of Children from Sexual Offence) Act and the JJ (Juvenile Justice) Act.

The school will ensure that training sessions are carried out on a regular basis in order that all staff members are aware of what protocols to follow in the event of an incident.

All new members of staff and Governors will receive an introduction to the School's Safeguarding Policy. They will receive contact details for the DSL and DDSL. They will be instructed on reporting and recording arrangements.

The DSL and DDSLs will receive advanced-level safeguarding and child protection training updated at least every two years, in addition to annual updates.

Members of the SLT, HR and other relevant managers with responsibility for staff recruitment receive regular safe recruitment training.

Temporary staff and volunteers will have regular child protection and safeguarding training. All staff supplied by other bodies will be made aware of the School's Child Safeguarding.

SAFER RECRUITMENT

The School endeavours to ensure that it does its utmost to employ 'safe' staff by following international standards. The School's Safer Recruitment Policy is adhered to in all recruitment activities.

SITE SECURITY

Harrow Bengaluru is a self-contained site. We employ a security team to control access to the site and to ensure the safe oversight of students leaving the campus. The School's Security Department provides oversight of the site and can be contacted in the event of an emergency or concerns. All visitors are expected to observe the procedures laid down in the School's Safeguarding Policy and Health & Safety Management Policy to ensure that students in the School are kept safe.

ROAD SAFETY

Staff regularly remind students about the importance of road safety. Bus drop off zones are clearly marked and protocol set. The Security Department supervises the bus drop off zone at key moments in the day.

THIRD-PARTY USE AND OFF-SITE ARRANGEMENTS

The School's facilities may, from time to time, be used by third party users (TPUs). Under these arrangements the School has no control over, and assumes no liability for, the conduct of individuals from TPUs. However, the School will ensure, as far as it is able, that TPUs have appropriate child protection and safer recruitment procedures in place. TPUs are also made aware of the areas of the School's grounds that are out of bounds. TPUs will be required to provide the School with a copy of their own child protection policies before approval is given for their use of the School's facilities, and all TPUs providing activities that involve children will be required to sign a declaration to confirm that:

- the TPU has a safeguarding policy in place;
- safer recruitment procedures are followed for the TPU's staff and volunteers; and
- all staff and volunteers are appropriately trained in child protection and safeguarding procedures.

The Head Master or the DSL will be informed of any child protection allegation or incident that takes place on the School's premises during use by that organisation.

PROCEDURE FOR DEALING WITH CONCERNS OR ALLEGATIONS OF ABUSE BY AN INDIVIDUAL OF A THIRD-PARTY USER USING THE SCHOOL'S FACILITIES

If an allegation of abuse is made about an adult in a TPU, the organisation's Safeguarding Officer must notify the Head Master or the DSL on the same day as the incident occurred or the disclosure was made, or as soon as possible thereafter. The School expects the TPU to follow its own Safeguarding Policy and the Head Master will require confirmation that appropriate action has been taken before further use of the School's facilities will be allowed.

EXTERNAL ORGANISATIONS WHO HAVE RESPONSIBILITY FOR STUDENTS ON ANOTHER SITE

When our students attend off-site activities, including day and residential visits and work-related activities, the School will check that effective safeguarding and child protection arrangements are in place.

STUDENTS STAYING WITH HOST FAMILIES

The School may sometimes arrange for students to stay with a host family during, for example, a foreign exchange trip or sports tour. In such circumstances, the School follows guidance to ensure that hosting arrangements are as safe as possible. We will work with partners to best ensure that safeguarding is as effective as reasonably possible.

PHOTOGRAPHY AND IMAGES

Most people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Nonetheless, we must ensure that we have safeguards in place. To protect our students, we will:

- demonstrate respect, care and caution when including photographs of school publications;
- encourage students to tell a member of staff if they are worried about any photographs that are taken of them; and
- prevent the possibility of linking the name of a student to an image; no image will carry a caption naming a student who can be clearly identified.

E-SAFETY

The use of technology is an integral part of everyday life but, as such, has also become a significant component of many safeguarding issues. In child sexual exploitation, radicalisation and sexual predation, for instance, technology often provides the platform that facilitates harm. Therefore, an effective approach to online safety empowers the School to protect and educate students in responsible use of technology and to establish mechanisms, which can identify, intervene in and escalate an incident where appropriate. All staff will be trained in the importance of online safety and how to teach children and young people about safeguarding and online safety. The breadth of issues classified within online safety is considerable, but can be categorised into three 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 child-to-child pressure, commercial advertising, and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes;
- conduct: personal online behaviour that increases the likelihood of, or causes, harm, for example making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nude and semi-nude photographs and/or pornography), sharing other explicit images and online bullying;
- commerce: risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

The School's e-safety policy is incorporated in the Pupil ICT Acceptable Use Policy. This explains how the School tries to keep students safe. Cyber-bullying and sexting by students, via texts and emails, will be treated as seriously as any other bullying type behaviour and will be managed through our counter-bullying procedures. The School also has a clear policy on the use of mobile and smart technology.

APPENDIX 1: INFORMATION FOR PARENTS

Harrow Bengaluru aims to safeguard and promote the welfare of the students in its care and protect them from serious harm.

Staff and volunteers are vetted for their suitability to work with children prior to appointment. They receive training in safeguarding and child protection. They will report any concerns in accordance with our procedures.

The School has a Safeguarding Policy, which is regularly reviewed and is available to parents. It is important for parents to be aware that:

- Staff and volunteers in the School have a duty to report concerns about a child, whether this means the child may be in need of additional support or help of some kind or whether it is thought that a child may have been abused or be at risk of harm. There are four categories of abuse: physical, sexual, emotional, neglect.
- If you think your child may have been abused in School (or during expeditions or co-curricular activities), you should contact our Designated Safeguarding Lead. If the allegation of abuse involves a member of staff, you should contact the Head Master directly, or if the Head Master himself is involved, the Chairman of the Governing Body should be contacted.
- If members of the School's staff need to express concerns about a student, it is understood that this can cause distress for the student's parents. It is important that all parties – parents and members of the School's staff – try to discuss these matters as calmly and sensibly as possible, and at as early a stage as is realistically possible.
- School Prefects are given basic training in safeguarding at the start of the academic year. There is also a programme of Peer Mentoring.

APPENDIX 2: CONCERNS OR ALLEGATIONS RELATING TO STAFF

This section lays out the process for dealing with concerns or allegations relating to staff (including the Head Master), volunteers and others (including Governors) who are in contact with students in the School. (References to staff in this policy include all staff employed at Harrow Bengaluru, part-time staff, contractors, volunteers and peripatetic staff).

REPORTING CONCERNS

It is essential that any concern or allegation of abuse made against a teacher, another member of staff, member of the Governing Body or a volunteer at Harrow Bengaluru is dealt with quickly, and in a fair and consistent way that provides effective protection for the child(ren) and at the same time supports the individual who is the subject of the allegation.

All staff and volunteers should know how to recognise and report concerns or allegations and should understand what to do if they have such concerns personally or hear an expression of such concerns or allegations against colleagues. On hearing an allegation or concern about abuse directly from a student, a member of staff should limit questioning to the minimum necessary for clarification. Leading questions should be avoided, and inappropriate guarantees of confidentiality should not be given. Rather, the student should be told the matter will be referred in confidence to the appropriate people in positions of responsibility. An accurate written record should be made for this purpose.

All allegations about members of staff (including the DSL, DDSLs, supply staff and volunteers) must be reported. Low-level concerns should initially be reported to the DSL; more serious allegations should initially be reported to the Head Master. It may be that the concern expressed has been raised by another party. If there are repeated reports of such concerns and/or questionable conduct, a pattern of unacceptable behaviour may be identified. All allegations against the DSL must be reported to the Headmaster. All allegations against the Head Master must be reported immediately to the Chairman of Governors (without informing the Head Master). Following this, the Head Master or the Chairman of Governors (as appropriate) will notify the DSL (or if the DSL is the subject of the allegation, the DDSLs). Concerns about any member of the Governing Body, including the Chairman, should be reported to the Head Master. It is vital that expressions of concern that do not necessarily amount to 'allegations' are reported, particularly if there are repeated reports of such concerns and/or questionable conduct.

Staff, parents and members of the Governing Body are reminded that they should NOT:

- investigate the matter themselves;
- make assumptions or offer alternative explanations for behaviours; or
- promise confidentiality to the alleged victim(s).

CHECKLIST OF IMMEDIATE REPORTING ACTIONS PROCEDURE FOR INDIVIDUAL MEMBERS OF STAFF/VOLUNTEERS/OTHER ADULTS

- Write a dated and timed note of what has been disclosed or noticed, said or done.
- Report the information immediately to the DSL, the Head Master or in his absence the Deputy Head Master.
- Pass on the written record.
- If the suspicion or allegation of abuse is against the DSL, the information must be taken to the Head Master.
- The Chairman of Governors deals with allegations of abuse made against the Head Master.

PROCEDURE FOR THE HEAD MASTER OR CHAIR OF GOVERNORS

- If there is no written record, write a dated and timed note of what has been disclosed or noticed, said or done.
- The Headmaster on receiving such information should inform the Chairman of Governors.
- The Head Master/Chair of Governors may ask to clarify details or circumstances of the allegation, but this must not amount to an investigation.

HOW ALLEGATIONS WILL BE MANAGED INITIAL ACTION

Decisions about course of action would be taken on a case-by-case basis, bearing in mind the paramount importance of the safety of any child(ren) involved but also remembering that the member of staff against whom an allegation has been made has the right to remain anonymous and to expect any allegations to be investigated as expeditiously as possible. Any course of action would be subject to a risk assessment.

Upon receiving an allegation or concern about a staff member, the case manager (whether the Head Master or the Chairman of Governors) will immediately discuss the allegation with the DSL and any required authorities. The case manager will:

- share what information is available, both from the source of the allegation and also from Personnel files;
- identify what other information might be needed;
- consider whether the alleged perpetrator should continue working or remain in contact with students and consider whether suspension is appropriate;
- decide whether the member of staff should be informed of the allegation at this stage; and
- decide what further action is needed and who needs to be involved and informed.

STRATEGY MEETING

If the parties involved in these discussions consider it necessary, a Strategy Meeting is arranged. From the above discussions, there are three possible courses of action:

- It may be the subject of a police investigation and possible action through the courts; or
- It may be the subject of a disciplinary investigation; or
- It may be a matter for the School to be dealt with through non-disciplinary routes.

If a police investigation concludes with the police deciding to take no action, the School will still need to consider what further investigation is necessary. If there is a case to answer, a disciplinary hearing will be called, which could lead to dismissal.

CASE SUBJECT TO POLICE INVESTIGATION

Where a criminal investigation has taken place and either (i) a trial has resulted, (ii) the investigation has been closed without charge or (iii) a decision has been taken not to prosecute a case after charge, the case manager can consider what further action is required as regards the member of staff concerned.

DISCIPLINARY INVESTIGATION

Where a disciplinary investigation is required, the investigation should be conducted in accordance with the School's disciplinary procedure. Whenever possible the person will be given a full opportunity to answer the allegation and make representations about it. The process of investigating the allegation, and reaching a judgment about whether it is substantiated, will continue even if the person does not cooperate. Suspension is never a default option and the School will consider all other options before suspending a member of staff. The School would only suspend someone if there were no reasonable alternative. If the suspension concerned a member of staff living away from the immediate possibility of contact with students, he or she could remain within their School accommodation but under carefully managed conditions and guidelines. If the suspension concerned a member of staff normally resident in a boarding House, accommodation would be found for them elsewhere.

SUPPORTING THOSE INVOLVED

The School's procedures will be managed with common sense and sound judgement throughout.

Cases may not meet the criteria requiring either a police investigation or a disciplinary procedure. In such situations, the School will resolve the matter as quickly as possible. Where more appropriate, the School may use the Complaints Procedure instead. As an employer, the School has a duty of care towards its employees. The School provides effective support for anyone facing an allegation and provides staff members with a named contact if they are suspended. Social contact with colleagues and friends will not be prevented, unless there is evidence to suggest that it is likely to be prejudicial to the gathering and presentation of evidence.

Parent(s)/guardian(s) of a student involved will be told about the allegation if appropriate as soon as possible, if they do not already know of it. They will also be kept informed about the progress of the case and told the outcome where there is not a criminal prosecution.

ACTION UPON CONCLUSION OF A CASE

The School will refer to the appropriate authorities any person who has been removed from working (paid or unpaid) in regulated activity, or would or might have been so removed had he/she not resigned or left of his/her own accord, and it believes the person may have harmed, attempted to harm, incited another to harm or put a child at risk of harm or if there is reason to believe the person may have committed a safeguarding related offence. 'Removal from working' for these purposes will include dismissal, non-renewal of a fixed-term contract, no longer using a supply teacher engaged directly or supplied by an agency, terminating the placement of a trainee or volunteer, no longer using staff employed by a contractor and resignation or voluntary withdrawal from any of the above.

In situations where, on conclusion of the case, it is decided that a person who has been suspended can return to work, the School will consider how best to facilitate this. The School appreciates that most people would benefit from some help and support when returning to work after a very stressful experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The School will also consider how the person's contact with the student or students who made the allegation can best be managed if they are still attending the School.

In the event that an allegation is shown to have been deliberately invented or malicious, the Head Master will consider whether any disciplinary action is appropriate against the student who made it. This may include permanent exclusion from the school. Appropriate referral will be made where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. The reasons such an order would be considered are 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'.

ABUSE OF TRUST

All members of staff should be aware that it is an offence for a person over 18 to have a sexual relationship with a child under 18 where the person is in a position of trust (e.g. Teacher), even if the relationship is consensual.

RECORDS

A central record of all allegations and concerns (and connected documents) against members of staff will be kept securely by the Head Master (or a Nominated Safeguarding Governor if it involves the Head Master), separate from normal staff and student records. The DSL and DDSs will always be kept informed of safeguarding and child protection matters, and will have access to all records. The only exception to this requirement for permanent recording is where allegations have been found to be

malicious. In such cases, all records will be removed from staff personnel files. The record will be retained at least until the member of staff involved has reached normal retirement age, or for a period of ten years from the date of the allegation if that is longer. An allegation which was proven to be false, unsubstantiated or malicious will not be included in references for staff. Every effort will be made to maintain confidentiality and to guard against publicity while an allegation is being investigated or considered. Apart from keeping the student(s), parent(s)/guardian(s) and the person about whom the allegation has been made (in cases when this would not place the student at further risk) up to date with progress of the case, information should be restricted to those who have a need to know in order to protect children, facilitate enquiries or manage related disciplinary processes.

TRANSFER OF RECORDS

Where there have been concerns about a member of staff and he or she leaves the School to work elsewhere, the school will always act in the best interests of children, sharing concerns with future employers. The DSL will pass allegations or concerns affecting a student on to his next school, if applicable.

Policy Published: May 2023

Updated: January 2025

Next Update: January 2026