



## MARLBOROUGH COLLEGE

# Safeguarding and Child Protection Policy

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## 1. Key School Contact Details

<b>Designated Safeguarding Lead (DSL)</b>  <b>Deputy Designed Safeguarding Lead (DDSL)</b>  <b>Other Safeguarding Leads (DSL)</b>		<b>DSL for the School</b> Mr Richard Willmetts TEL: 01672 892519 EMAIL: <a href="mailto:rdw@marlboroughcollege.org">rdw@marlboroughcollege.org</a>  <b>Deputy DSL</b> Mrs Julia Hodgson TEL: 01672 892301 EMAIL: <a href="mailto:jah@marlboroughcollege.org">jah@marlboroughcollege.org</a>  <u>Mr Julian Hodgson</u> EMAIL: <a href="mailto:jh@marlboroughcollege.org">jh@marlboroughcollege.org</a>  Mrs Qingwei Li EMAIL: <a href="mailto:ql@marlboroughcollege.org">ql@marlboroughcollege.org</a>  Mrs Heidi Marvin EMAIL: <a href="mailto:hjcm@marlboroughcollege.org">hjcm@marlboroughcollege.org</a>  Mr J Blake EMAIL: <a href="mailto:jblake@marlboroughcollege.org">jblake@marlboroughcollege.org</a>
<b>Acting Deputy Head (Pastoral)</b>		Mr WDL Nicholas TEL: 01672 892283 EMAIL: <a href="mailto:wdln@marlboroughcollege.org">wdln@marlboroughcollege.org</a>
<b>Master</b>		Mrs Louise Moelwyn-Hughes TEL: 01672 892400 EMAIL: <a href="mailto:ljmh@marlboroughcollege.org">ljmh@marlboroughcollege.org</a>
<b>Members of Council</b>		<b>Chairman of Council</b> <b>Mr Giles Henderson, CBE</b> TEL: 01672 892390 EMAIL: <a href="mailto:gihenderson@marlboroughcollege.org">gihenderson@marlboroughcollege.org</a>  <b>Nominated Safeguarding Member of Council</b> Mrs Penny Cameron Watt TEL: 01672 892390 EMAIL: <a href="mailto:pcameron-watt@marlboroughcollege.org">pcameron-watt@marlboroughcollege.org</a>

## 2. Key External Contact Details

<b>Wiltshire Council Designated Officer For Allegations (DOFA)</b>	Mr Anton Hammond Tel: 0300 4560108 Option 3 then Option 4 Email: <a href="mailto:dofaservice@wiltshire.gov.uk">dofaservice@wiltshire.gov.uk</a>
<b>Wiltshire Multi-Agency Safeguarding Hub (MASH)</b>	TEL: 0300 4560108 Mon-Thur 8.45-5pm Fri 8.45-4pm Out of House Emergency Duty Service 0300 4560100 EMAIL: <a href="mailto:mash@wiltshire.gov.uk">mash@wiltshire.gov.uk</a>
<b>Support and Advice about Extremism</b>	<p><b>Wiltshire Police</b> TEL: Anti-Terrorist Hotline 0800 789 321 EMERGENCY: 999 NON-EMERGENCY NUMBER: 101 Email: <a href="mailto:PreventReferrals@wiltshire.pnn.police.uk">PreventReferrals@wiltshire.pnn.police.uk</a> Website: <a href="http://www.gov.uk/ACT">www.gov.uk/ACT</a></p> <p><b>Wiltshire Council Prevent Team</b> TEL: 01380 826454 or 101 WEBSITE: <a href="http://www.wiltshire.gov.uk/community-safety-prevent">www.wiltshire.gov.uk/community-safety-prevent</a> NON-EMERGENCY NUMBER: 020 7340 7264 EMAIL: <a href="mailto:counter.extremism@education.gsi.gov.uk">counter.extremism@education.gsi.gov.uk</a></p>
<b>NSPCC Whistleblowing Advice Line</b>	ADDRESS: Weston House 42 Curtain Road London EC2A 3NH TEL: 0800 028 0285 EMAIL: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
<b>Disclosure and Barring Service</b>	ADDRESS: DBS customer services PO Box 3961 Royal Wootton Bassett SN4 4HF TEL: 03000 200 190 EMAIL: <a href="mailto:customerservices@dbb.gov.uk">customerservices@dbb.gov.uk</a>

### 3. NMS Standard 11 - Child Protection

The school ensures that:

- Arrangements are made to safeguard and promote the welfare of pupils at the school; and
- such arrangements have regard to any guidance issued by the Secretary of State.

### 4. NMS Standard 14 – Staff Recruitment and Checks on Other Adults

- 14.1 Schools operate safe recruitment procedures and vet staff in line with the regulatory requirements and having regard to relevant guidance issued by the Secretary of State.
- 14.2 For all persons over 16 (not on the roll of the school) who after April 2002 began to live on the same premises as boarders but are not employed by the school, there is a Disclosure and Barring Service check completed at the standard level.
- 14.3 There is a written agreement between the school and any person over 16 not employed by the school but living in the same premises as boarders (for example, members of staff households). This specifies the terms of their accommodation, guidance on contact with boarders, their responsibilities to supervise their visitors, and notice that accommodation may cease to be provided if there is evidence that they are unsuitable to have regular contact with children. They must be required to notify an unrelated designated senior member of staff if they are charged with, or convicted of, any offence.
- 14.4 All persons visiting boarding accommodation (e.g. visitors, outside delivery and maintenance personnel) are kept under sufficient staff supervision to prevent them gaining substantial unsupervised access to boarders or their accommodation.

This Policy addresses Independent School Standards Regulations (ISSRs) and the consequent ISI Regulatory Requirements (effective from Feb 2016) Part 3 – Welfare, health and safety of pupils, Paras 7 (a) and (b), 8 (a) and (b).

This Policy will have regard to the Government (DFE) guidance in the following documents:

Keeping Children Safe in Education September (2020) Update January 2021 (post EU Exit). The full guidance, Keeping Children Safe in Education can be found at: <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

A summary for staff can be found at:

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

### 5. Working Together to Safeguard Children July 2018

The procedures of the Wiltshire Safeguarding Vulnerable People Partnership (formerly WSCB).

Allegations Against Adults who work with children – Wiltshire SVPP Flowchart (Review dated September 2020)

What to do if you're worried a child is being abused or neglected – Wiltshire SVPP Flowchart September 2020

6. Wiltshire Safeguarding Thresholds Guidance December 2018.  
Links to the above documents can be found at [www.wiltshirescb.org.uk](http://www.wiltshirescb.org.uk)
7. The Prevent Duty: Departmental advice for schools and childcare providers, August 2015  
<https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty>
8. Mental Health and behaviour in schools November 2018  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/755135/Mental\\_health\\_and\\_behaviour\\_in\\_schools\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/755135/Mental_health_and_behaviour_in_schools_.pdf)  
This policy applies to all staff employed by Marlborough College, including temporary and part-time staff and volunteers.
9. This policy should be read in conjunction with the following College Policies and Guidance:  
*College Policy and Procedures on Sexting*  
*College Policy and Procedures on Peer on Peer Abuse*  
*Countering Bullying Policy*  
*Behaviour Management Policy*  
*Code of Conduct (Staff Behaviour Policy)*  
*ICT, Social Media and E-Safety Policies*  
*Children Missing Education Policy*  
*Supervision Policy*

**Terms:** In this document the terms Designated Safeguarding Lead (DSL) and Child Protection Co-Ordinator are interchangeable.

## 10. Policy Aims

The central aim of the following procedures is to ensure that the protection and general welfare of all College pupils is of paramount importance.

*The College aims to safeguard and promote the welfare of all its pupils. In addition, some pupils will require specific child protection support to enable them to thrive.*

## 11 Education, Training and Prevention of harm

Marlborough College believes that safeguarding and promoting the welfare of children is the responsibility of **all** members of the community. Everyone who comes into contact with children and their families has a role to play in identifying concerns, sharing information and taking prompt action. The College promotes an open culture in which concerns or questions about safeguarding can be discussed or raised at any time, and in any context.

Training and induction in Child Protection issues is provided for all staff, whether they hold an academic, pastoral or other role, including temporary staff and volunteers. All employees of the College are issued with Child Protection guidelines and all staff have access to the protocol to be followed in the event of Child Protection concerns. All members of staff, including temporary staff and volunteers, receive a Child Protection induction on the commencement of their employment at the College; this includes a copy of the Child Protection Policy, the staff Code of Conduct, a copy of Part I of Keeping Children Safe in Education September (2020) Update January 2021 (post EU Exit), and a copy of Annex A of KCSIE. This induction includes the identity of the Designated Safeguarding Lead and makes clear that **anyone** can make a referral to children's social care if a child is in immediate danger or is at risk of harm. All staff are required to read at

least Part 1 and Annexe A of Keeping Children Safe in Education (KCSIE) and receive regular training, in line with advice from the Wiltshire SVPP. Mechanisms are in place to enable staff to understand and carry out their role and responsibilities as set out in Part 1 of KCSIE. These include online training, developed for Marlborough College in conjunction with Cylix (online training provider), and an online questionnaire. All staff receive training on Peer on Peer Abuse.

Procedures are in place for staff appraisal and monitoring. In addition, staff receive regular annual updates on safeguarding and child protection issues, via the DSL and HR Departments, either in written form, or in person, via staff meetings.

Safeguarding and e-safety issues at Marlborough College are addressed through the curriculum and co-curriculum as appropriate; details can be found in the Countering Bullying Policy. We also ensure that bullying is identified and dealt with (see Countering Bullying Policy). The College's Bullying Statement is included in the Almanac issued to all pupils, parents and staff, is written into the Common Room Handbook and Parents' Handbook and is published on House Notice Boards. In it the right of all members of the College to enjoy their lives free of bullying and harassment is asserted, as is the expectation that all members of the College are expected to treat each other as they hope to be treated themselves in an atmosphere of mutual respect.

### 11.1 Early Help

The College recognises that early help can provide support for children experiencing problems, such that risks are minimised, harm is avoided and the need for intervention from statutory and specialist agencies is reduced.

It recognises, further, that providing early help can be more effective in safeguarding and promoting the welfare of children than reacting later, once a crisis point has been reached.

*"Preventative services can do more to reduce abuse and neglect than reactive services. Many services and professions help children and families so coordinating their work is important to reduce inefficiencies and omissions."*

The Munro Review of Child Protection: Final Report, *A child-centred system*, Professor Eileen Munro, May 2011

**Early help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years.**

The College will follow the guidance provided by the Wiltshire SVPP in identifying, assessing and acting to support children who may benefit from early help.

Effective early help relies upon local agencies working together to:

- identify children and families who would benefit from early help;
- undertake an assessment of the need for early help; and
- provide targeted early help services to address the assessed needs of a child and their family which focuses on activity to significantly improve the outcomes for the child.

**All staff** at the College who work with children and their families have a role to play in identifying those pupils who may benefit from additional support. The tutorial structure enables staff to quickly refer concerns through HMs and, through them, to the DSL, as appropriate.

The full boarding nature of the College means that many additional sources of support, such as educational psychologists, Learning Support, counselling, access to psychologist and psychiatrist services, etc. can be provided within the term-time structure.

Medical services, access to a GP and onwards referral (e.g. to CAMHS) are also provided within the College structure. Coordination and liaison between services is facilitated by the regular Pastoral Meetings, which the DSL attends.

When early or additional help is needed it would be usual to involve parents from the outset. Concerns can be raised with parents by HMs, or directly by the Medical Centre, or by the DSL.

## **12. Mental Health and Safeguarding**

The statutory guidance Keeping Children Safe in Education (KCSIE) makes clear the link between mental health and safeguarding, and stresses the role that school play in detecting possible problems and supporting good mental wellbeing.

Marlborough College recognises that safeguarding and promoting the welfare of children includes preventing the impairment of children's mental (as well as physical) health and development. All staff should be aware that mental and emotional health problems can be an indication of abuse, neglect or exploitation, or of other safeguarding concerns. In addition, staff should also be aware that adverse childhood experiences can have a lasting impact on the mental health, behaviour, education and wellbeing of young people.

Boarding and other pastoral staff at Marlborough College are well placed to identify behaviour which may indicate that a child is experiencing mental health problems or is at risk of developing problems. The pastoral structure promotes the rapid communication of concerns to and from a child's HM, to and from the DSL (where there may be additional safeguarding concerns), and to and from the wider pastoral team. All staff, in whatever role, should raise any concern about a pupil's mental health without delay, and should follow up the concern as appropriate. Concerns should be raised with the HM in the first instance. If a member of staff is concerned that a pupil is in immediate danger (e.g. because of behaviours indicating self-harm or suicidal ideation) then they should remain with the pupil, while seeking urgent help from other staff. This may include calling 999.

The school recognises its role in supporting pupils' mental health and seeks to work closely with parents and others, as appropriate, to share resources and training, to promote mental and emotional wellbeing and to obtain access to appropriate and timely support and intervention. There are clear systems in place for identifying possible problems, and for escalating concerns. Written protocols are in place for managing pupils with mental health issues such as disordered eating, self-harming behaviours and suicidal ideation.

All new pastoral staff receive training in recognising mental health concerns, primarily through the YMHFA organisation. Mental wellbeing forms a part of the PSHEE programme for pupils, as well as being central to ongoing tutorial conversations. Pastoral staff have access to CPD in respect of recognising and responding to the signs of mental ill health. Understanding the link between feeling emotionally safe, resilient and supported by trusted adults, and effective learning, is central to the College's educational ethos.

## **13. Online Safeguarding**

The College has in place a number of structures to support its commitment to keeping pupils safe online. These include monitoring and controls within the College's internet provision, restrictions on the use of VPNs and robust 'firewalls'. Routine weekly reports on internet activity, against the firewall, under a number of safeguarding headings are scrutinised for patterns and concerns.

Education about online safety, including risks associated with sexual images and YPSI, grooming, identity theft, reputational damage, technology-assisted harmful sexual behaviours (TA-HSBs) etc. forms part of the PSHEE and RSE programme for pupils.

The College promotes a strongly collaborative approach to online safeguarding and provides extensive access to resources, training and information to parents about how to keep their children safe online.

The College ICT Policy and Social Media Policy have regard to the need to safeguard pupils online.



The member of staff responsible for online safeguarding is **Richard Willmetts, DSL**.

#### **14. Information sharing**

It is important that information relating to the safeguarding of children's welfare is shared.

The DfE emphasises that "The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purpose of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children."

In other words, data protection law is not a barrier, but it is a system of checks and balances to be borne in mind when recording, sharing and retaining vital but sensitive data.

The following guidance is available:

Information Sharing: Advice for Practitioners Providing Safeguarding Service to Children, Young People, Parents and Carers 2018

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

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/747620/Data\\_Protection\\_Toolkit\\_for\\_Schools\\_OpenBeta.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/747620/Data_Protection_Toolkit_for_Schools_OpenBeta.pdf)

#### **15. Recruitment**

Marlborough College makes stringent background checks regarding all Child Protection matters on any person appointed to the staff and is committed to Safer Recruiting procedures. These include the provision for Enhanced Disclosure and Barring Service and banned list checks for all persons employed by the College in regulated activities, and for the regular updating of such checks, as well as the maintenance of a Central Register of Employment for all College staff.

Pre-employment checks at the College are carried out, appropriate to the role offered and duties involved, to ensure that anyone employed is not subject to a prohibition order, direction, sanction or restriction issued by the Secretary of State. For those appointed to teach, checks are carried out to ensure they are not prohibited from teaching. For those engaged in management roles, an additional check is carried out to ensure they are not prohibited under Section 128 of the Education and Skills Act 2008. At least one member of any interview process for employment to the College will have received training in Safer Recruiting procedures. Marlborough College also has arrangements in place for the welfare of pupils, in respect of any person living in College boarding accommodation who is not employed by the College, such as the spouses or children over the age of 16 (who are not themselves members of the College) of those with residential responsibilities.

Further details of the College's process for recruitment can be found in the Recruitment Policy, available on the College VLE and on request from the HR Department.

In the case of Marlborough pupils working with adults who are not employed by the College, e.g. through the College's Outdoor Activity and Outreach programmes, measures are in place to ensure that appropriate Child Protection checks and procedures are in place, including where pupils are on a site other than the College.

Visitors to the College whose business is pupil-centred are issued with a Statement of Community Norms and Values, which makes reference to the 'duty of care' to safeguard and promote the welfare of pupils.

All visitors, in any capacity, are subject to the College's security procedures, which includes identifying them as visitors whilst on College premises.

## 16. Reporting to the Police

The College will follow the guidance document published by the National Police Chief's Council (NPPC) to help clarify when to consider calling the police and what to expect when a report is made.

The DSLs and Senior Management Team, including the Second Master, will use the guidance when liaising with police and safeguarding advisors on safeguarding issues, as well as in considering pupil behaviour in respect of e.g., peer-on-peer abuse, physical assault, harassment, online behaviour, theft etc.

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

## 17. Child Protection Statement

In order for each adult member of the Marlborough College community to respond appropriately to matters relating to suspected, alleged or actual child abuse, there exist Standing Guidelines on Child Abuse matters. These recognise that child abuse can encompass neglect, physical injury, sexual abuse and emotional abuse, (including CSE and CCE) of anyone under the age of 18 by someone who is either an adult or an adolescent, and also acknowledge that peer on peer abuse can occur. The Standing Guidelines give advice as to the appropriate response to a child who discloses abuse, and on the action to be followed by adults in the event of suspicion or knowledge of abuse.

All members of staff should be aware that if, at any point, there is immediate danger or risk of serious harm to a child a referral should be made to children's social care and/or the police directly and without delay, and that **anyone** can make a referral. Staff should note that parental consent is not required in the case of referrals to statutory agencies.

A member of staff with any suspicion, knowledge or disclosure that a child might be being or have been abused MUST make a formal written record of the cause for concern as soon as possible and must inform the DSL immediately and directly (or the Deputy DSL or Master). This includes instances where a complaint involves a member of staff.

**Any** member of staff who has a concern or allegation about school practices or the behaviour of colleagues which is likely to put pupils at risk of abuse or other serious harm, must report this to the DSL (or the Deputy DSL and the Master) immediately.

***Behaviour that indicates an adult 'may not be suitable to work with children': transferrable risk***

The so-called 'harm test' refers to behaviours that may indicate that a person poses or might pose a risk of harm if they continue to work in regular or close contact with children. Such behaviours may occur outside of school and may not involve children, but may have, nonetheless, an impact on a person's suitability to work with children. Domestic violence is an example of such behaviour; where violent behaviour is triggered there is the risk to children at school.

The College recognises that there may be 'transferrable risk' associated with such behaviours. Staff should report any allegation of such behaviours to the DSL, as a safeguarding issue.

In all cases, allegations involving staff or volunteers will be referred to the Designated Officer for Allegations for advice before any investigation takes place, within one working day. Other external agencies, including the police may be involved from the outset.

In the case of concern or allegations in respect of Child Protection, involving the Master or the DSL, a member of staff must report this to the Chairman of Council immediately (contact via 01672 892 390)

**Immunity from retribution or disciplinary action against members of staff for “whistle-blowing” in good faith is assured.**

It is the duty of **all members of staff** to be informed and vigilant in these matters, and to be familiar with the contents of the College’s Safeguarding and Child Protection Policy, for the protection and general welfare of all College pupils is of paramount importance.

**All members of staff** who come into contact with pupils and their families must meet the College’s policy on Confidentiality (Appendix K).

**All members of staff** who come into contact with pupils and their families must be aware of the College’s procedures in respect of boarding pupils who are absent without leave (i.e., missing pupil procedure) – see College Supervision Policy (College website).

**All members of staff** must follow the Code of Conduct, issued to all staff as part of their induction procedures.

Any deficiencies or weaknesses in the College’s Child Protection arrangements, which the College become aware of via any means, will be remedied without delay.

### **17.1 Low Level Concerns about an adult:**

It is important to maintain a culture of openness, trust and transparency in which staff are confident and clear about the expected values and behaviours of themselves and their colleagues. Staff should feel able to raise low-level concerns, whether about their own or a colleague’s behaviour, where that behaviour might be construed as falling short of the standards set out in the College’s Code of Conduct for Staff and Volunteers with relation to Children and Young People. This is consistent with Working Together to Safeguard Children, July 2018 which states “Children are best protected when professionals are clear about what is required of them individually and how they need to work together”.

Senior staff should provide for responsive, sensitive and proportionate handling of such concerns when they are raised, maintaining confidence that concerns raised will be handled promptly and effectively and that staff are protected from false allegations or misunderstandings.

From time to time an individual may find him/herself in a situation which might appear compromising to others or which could be misconstrued. Equally, an individual may for whatever reason have behaved in a manner which on reflection he/she considers falls below the standard set out in the College’s Code of Conduct for Staff and Volunteers with relation to Children and Young People. Self-reporting in these circumstances is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual’s own actions or how these might be perceived.

Should a low-level concern exist about another adult, it should be reported to the Master as soon as possible. The Master will consider, in consultation with the DSL as appropriate, whether the reported matter is a low-level concern and whether it should be reclassified as an allegation and dealt with accordingly.

Where the Master is in any doubt whatsoever about the classification of a reported concern, the DSL or The Master will seek advice from the DOFA on a no-names basis. Having established that the concern is low-level, the DSL or Master (as appropriate) will discuss it with the individual who has raised it and will take any other steps to investigate it as necessary. Most low-level concerns by their very nature are likely to be minor and will be dealt with by means of guidance, training and support.

## **17.2 Young Carers:**

The term “young carer” refers to anyone under the age of 18 who helps to look after a relative or close friend, where that relative or close friend possesses a disability, illness, mental health condition, drug or alcohol problem.

The day-to-day responsibilities of young carers will often include cooking; cleaning; shopping; providing nursing and intimate personal care; giving emotional support; financial management; and caring for siblings.

The Care Act (2014) identifies the key point relating to young carers and safeguarding:

“Children should not undertake inappropriate or excessive caring roles that may have an impact on their development. A young carer becomes vulnerable when their caring role risks impacting upon their emotional or physical well-being and their prospects in education and life.”

The College will be “particularly alert” to the needs of young carers and recognises the fact that young carers may be pupils who require early help. Should concerns arise about the developmental needs of a pupil who is a young carer, the appropriate referral for further assessment will be made to Wiltshire SVPP to access further support as required.

The nominated Designated Safeguarding Lead with responsibility for Young Carers is Mr Richard Willmetts, Designated Safeguarding Lead.

Staff are made aware of the needs of young carers through Common Room briefings and updates and Housemasters and Housemistresses should make members of their House teams aware of pupils who are young carers. Staff will have training on ‘spotting the signs’ of young carers and should raise any concerns immediately.

The Admissions Department application form allows parents to inform the College that their child/children is/are also a young carer/s.

## **17.3 Looked After Children (LAC):**

Looked After Children are those children under the age of 18 living in the care of their Local Authority or living with adopted parents.

The College will endeavour to identify and support current and previously Looked After Children, working closely with the “Virtual School Head” (VSH), as appointed by the Wiltshire SVPP, to promote their educational achievement and best possible outcomes.

The Designated Teacher with responsibility for Looked After Children at the College is, Mr Richard Willmetts, Designated Safeguarding Lead. The Designated Teacher and other DSLs will offer assistance to any staff who are supporting such pupils in the College.

Staff are made aware of the potential vulnerabilities and needs of Looked After Children through Common Room briefings. Housemasters and Housemistresses should make members of their House teams aware of any pupils with LAC status. Any concerns regarding such pupils should be raised immediately.

## **18. The Role of the Designated Safeguarding Lead/Child Protection Co-ordinator**

For the Academic Year 2020/2021:

The Designated Safeguarding Lead/Child Protection Co-ordinator is the Acting Assistant Head Safeguarding:

Mr. Richard Willmetts: T: 01672 892519; M: 07394 564897; E: [rdw@marlboroughcollege.org](mailto:rdw@marlboroughcollege.org)

The Acting Deputy DSL/Child Protection Co-ordinator is:

Mrs Julia Hodgson, T: 01672 892301; M: 07833 747803 E: [jah@marlboroughcollege.org](mailto:jah@marlboroughcollege.org)

The role of DSLs is to help promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing or have experienced. The DSLs ensure that staff, as appropriate, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort. They support teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children. All DSLs are trained to the same level and able to manage any safeguarding incident. Further to this, DSLs have particular roles in order to ensure that all aspects of safeguarding are managed effectively.

Briefly, the Designated Safeguarding Leads are responsible for:

- Ensuring that staff are aware of and alert to the signs of abuse and the steps which staff must take when abuse is suspected.
- Organising for the regular safeguarding and child protection training of all members of staff and others with responsibility for the care of pupils, including in respect of online safety. In accordance with legislative requirements training for the DSLs is updated at least every **two years to Level 3 standard**, and training for the Master and members of staff is updated on a regular basis.
- Residential pastoral staff receive safeguarding training to Level 3 standard.
- Senior Pupils who hold positions of responsibility (Prefects and Heads of Houses) with regard to other pupils are also given training on Safeguarding issues, at the commencement of their duties, and on an annual basis. Prefects are briefed by the Second Master, Proctor or Head of Sixth Form, and Heads of Houses are briefed by the Acting Deputy Head ((Pastoral).
- The dissemination to staff of information about local SVPP-approved procedures in responding to suspected abuse or to the disclosure of abuse.
- Ensuring the College's consultation and cooperation with inter-agency referral, as appropriate. This will involve prompt communication with the Wiltshire SVPP in the event of an allegation or disclosure of abuse, and the following up of this communication in writing within 24 hours. This may include participation in Wiltshire SVPP Designated Officer for Allegations (DOFA)-led case conferences with the Wiltshire SVPP and/or Police.
- This will also include prompt communication with MASH teams in respect of broader concerns about child welfare and safeguarding, and working with other services (including social care, police, health services) to promote the welfare of children and protect them from harm.
- Maintaining a confidential written record of all concerns, discussions and decisions and the reasons for those decisions, in relation to safeguarding. In addition, to maintain a central written record of all contact with the Wiltshire SVPP and MASH, including both formal allegations against adults and informal concerns raised. Records will be kept confidentially and reviewed with the Member of Council with termly responsibility for safeguarding so that concerning patterns of behaviour can be spotted.
- Providing support (once the paramount interests of the child have been ensured) to the child's HM and to any member of staff who has been concerned with a Child Protection investigation in any way.

- Organisation for an annual Review of the College's Safeguarding and Child Protection Policy and procedures and of the efficiency with which the related duties have been discharged. This involves the submission of all relevant documentation, including a written record of all Child Protection issues for the preceding year, to the Member of Council with specific safeguarding responsibilities. There then follows a meeting between the Member of Council and the DSL, in advance of the Lent Term Council Meeting in any given year.
- For the academic year 2020-21, the Member of Council with specific safeguarding responsibilities is **Mrs Penny Cameron Watt**. Email: [pcameronwatt@marlboroughcollege.org](mailto:pcameronwatt@marlboroughcollege.org)
- Completion of an annual audit safeguarding provision, in compliance with Wilts SVPP structures.
- Annual review of the College's Safeguarding and Child Protection Policy, in line with KCSIE; dissemination of information relating to key changes.
- Informing the Master immediately in all cases where child abuse is alleged or suspected, involving any member of Marlborough College, staff, volunteers or pupils. Whenever any matter of suspected or actual child abuse is about to be formally investigated by any of the agencies mentioned above (Wiltshire SVPP or Police) the DSL shall inform the Master and the Member of Council with specific responsibility for Child Protection.
- The drawing up of risk assessments and/or pastoral care plans where there is a considered to be a significant risk to a child's welfare from whatever cause, including self-harm.
- Implementation of the College's response to the Prevent strategy in respect of safeguarding children from radicalisation and the risk of being drawn into terrorism.
- Ensuring that, where pupils join or leave the College, their child protection file (as appropriate) is transferred between the new school and College as soon as possible, ensuring secure transit, and confirming receipt.
- In addition, the DSL will consider appropriate information sharing in advance of a child leaving, to enable support to be put in place, as appropriate.
- Working with pastoral and other leaders to ensure that children are safeguarded from potentially harmful and inappropriate online material. This includes monitoring the College's firewall and the efficiency of College filtering systems, including VPNs.
- Finally, if any member of staff at any time wishes to have access to any or all of the Department of Education's documentation on the responsibilities of Schools with regard to Child Protection it is the duty of the DSL to make them available.

## 19. Standing Guidelines to Staff on Child Abuse Matters

### 19.1 What is Child Abuse?

Child 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. They may be abused by an adult or adults, or another child or children (peer-on-peer abuse). 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.

Children may be abused in a family or in an institutional or community setting by those known to them, or more rarely, by others (e.g., via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse.

Child abuse can encompass:

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during

pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

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

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

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

Thus bullying (which usually involves systematic unpleasantness within year groups or across Lower School year groups) does not usually come under the heading of Child Abuse. The College's Countering Bullying Policy exists as a separate document.

However, in cases where there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm as a result of the action of another child or children, then the College will have a duty to refer the situation to the local safeguarding agencies, (see College Policy and Procedures on Peer-on-Peer Abuse).

In addition, staff should be aware that child abuse can occur through Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE). In CSE and CCE a power imbalance is used to deceive, coerce or manipulate a child into sexual or criminal activity. Further information is given in Appendix D.

All staff must be aware:

- That safeguarding issues are complex and sensitive;
- That pupils may suffer physical, sexual or emotional abuse or suffer as a result of neglect, either at home or at school, and that abuse, neglect and other specific safeguarding issues (such as CSE, CCE, FGM, honour-based violence etc.) are rarely stand-alone events that can be covered by one definition or label;



- Of the behavioural and physical indications that may reveal the possibility of abuse.
- That additional barriers can exist when recognising abuse and neglect in children with special educational needs. These barriers can include (a) assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration; (b) children with SEN and disabilities can be disproportionately impacted by things like bullying – without outwardly showing any signs; and (c) communication challenges and difficulties in overcoming these challenges.
- That safeguarding incidents and/or behaviours can be associated with factors outside the College and/or can occur between children outside the College.
- Contextual safeguarding means considering the context in which such incidents and/or behaviours occur, and considering wider environmental factors which may be present in a child's life which threaten their welfare and/or safety. These factors can be used to inform both the referral process and a full assessment of the child's needs.
- That children are capable of abusing their peers, and that such abuse should never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'. Marlborough College has a policy and a clearly defined procedures for dealing with Peer-on-Peer Abuse.

## 19.2 Safeguarding and the Prevent Duty

As part of the College's commitment to safeguarding pupils, staff will follow Department of Education guidance in respect of the Prevent Duty i.e., the duty under Section 26 of the Counter-Terrorism and Security Act 2015 to have "due regard to the need to prevent people from being drawn into terrorism".

The College acknowledges that, in certain circumstances, young people can be susceptible to radicalisation – the process by which a person comes to support terrorism and forms of extremism leading to terrorism – and also that appropriate intervention and support can prevent vulnerable people being drawn into terrorist-related activity.

Extremism is defined in the DfE guidance as "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." The College promotes these values through its overall ethos, and they are reinforced through the academic curriculum, the role of the Chapel, the PSHEE programme, the opportunity for service and achievement offered by the co-curriculum, the College's global connectivity, among many aspects of boarding life. Not least, the pastoral care offered to pupils, focusing on individual self-worth, participation in and service to the community and positive aspiration, acts to reduce the risk factors which lead to disengagement and vulnerability to extremism, and to build resilience to radicalisation.

The Designated Safeguarding Leads will work with key staff, including Pastoral Teams and Heads of Department to identify vulnerable children, and to ensure that the College ICT systems provide adequate protection from the risks of online radicalisation.

As with any safeguarding issue, any concerns should be raised immediately with the Designated Safeguarding Lead. A risk-assessment may be carried out and, depending on the outcome, a referral may be made to the Wiltshire SVPP via the Channel program or [PreventReferrals@wiltshire.pnn.police.uk](mailto:PreventReferrals@wiltshire.pnn.police.uk)

A full briefing for staff may be found on Firefly along with other further information and advice. <https://firefly.marlboroughcollege.org/safeguarding--for-all-staff/the-prevent-strategy>

At all stages, the College will work together with existing local partnerships and in accordance with government advice.



### 19.3 How should members of staff respond in order to help a child who discloses abuse?

- i. Listen patiently and comfort
- ii. Stay calm and controlled: do not show revulsion or distress.
- iii. If a pupil approaches a member of staff and asks to speak in confidence the member of staff must be sympathetic and supportive but should *never* fall into the trap of promising complete confidentiality. *In cases of the disclosure of abuse it is obligatory for a member of staff to report the offence even if the pupil does not wish to do so.*
- iv. Reassure the child frequently that the abuse is not his/her fault. Make it clear that the disclosures have not made you lose affection or respect for them.
- v. Reassure the child that he/she should not feel guilty for telling.
- vi. Make a *formal written record as soon as possible, as appropriate to the context of the disclosure, noting down: Date / Time / Place / Nature of disclosure / any relevant details.*

### 19.4 How should members of staff respond in order to help children where abuse is suspected?

- A member of staff with any suspicion that a child might be being abused, based on what they observe, hear or are told, should make a *formal written record as soon as possible*, noting down: Date / Time / Place / Nature of injury or concern / Explanation given / Demeanour.

(NB Law prevents parents from demanding to see such written records). Hand written records or notes made at the time are preferable to typed notes after a time interval.

- In any conversation with a child about possible abuse a member of staff must be very careful not to ask leading questions: Do no more than listen sympathetically and report the matter.

A member of staff must pass on immediately all safeguarding concerns/information on to the DSL (or Acting Deputy DSL), unless there is an immediate risk of harm to a child or the child is in immediate danger, in which case, any member of staff can make a referral to children's social care and/or the police directly and without delay. A member of staff who makes a referral directly should inform the DSL as soon as possible thereafter.

NB In no circumstances should any member of staff including HMs conduct an investigation into possible Child Abuse or decide whether a child has been abused (this is the role of specialist agencies) or alert a child's parents to such possibilities unless they have been authorised to do so.

Where child abuse is suspected or disclosed it is the role of the DSL to refer to external agencies using the appropriate route:

Children **in need of support** will be referred to children's social care for inter-agency assessment using Common Assessment Framework (CAF) guidelines to initiate a Team around the Child (TAC) response.

Children **at risk of harm** will be reported immediately to children's social care, who will advise on the course to be followed.

In cases of **allegations that refer to possible abuse** the DSL will report to the Wiltshire SVPP Designated Officer for Allegations (DOFA) without delay, and within one working day, seeking advice as to how to respond to the allegation. Where criminal behaviour or serious harm may have occurred, other agencies, including the police, will be involved from the outset.

The seconded DOFA for Wiltshire is: **Anton Hammond Tel: Tel: 0300 4560108** Option 3 then Option 4; Email: [dofaservice@wiltshire.gov.uk](mailto:dofaservice@wiltshire.gov.uk)

**Multi-Agency Safeguarding Hub (MASH)**

**Tel: 0300 4560108**

**Out of Hours Emergency Duty Service**

**Tel: 0300 4560100**

Members of staff should, at all time, avoid putting themselves in situations where they are vulnerable to or capable of being misunderstood:

There are three sensitive areas:

- **The One-to-One Adult Staff / Pupil private interview**

There are several contexts where members of staff with academic, pastoral and other responsibilities may need to meet on a one-to-one basis with individual pupils. Typically, tutorial meetings are held on a one-to-one basis in boarding houses. Careers and university guidance, co-curricular and academic support beyond the teaching timetable may be offered on a one-to-one basis. In such instances, it may be appropriate to maintain privacy but if possible, have a classroom, office or bedsit door ajar or an external sightline, or ensure that the meeting is known to others and the setting rendered contextually “formal” i.e. occurring at an appropriate time and in an appropriate place for the business being conducted.

If the interview is likely to be sensitive members of staff are asked to make sure that someone (e.g. secretary / another member of staff with pastoral responsibility / HM) knows that the interview is taking place.

- **Physical Contact with Pupils**

This may be perfectly acceptable in the context of instruction or coaching e.g. Music or PE lessons or where safety demands it (e.g. to assist an injured pupil, or in breaking up a fight). Also, where a member of staff with specific pastoral responsibility instinctively feels that it is right for him/her to touch a pupil’s arm or shoulders in order to give reassurance, it is probably right to do so. However, members of staff should always be very careful in doing the latter and never do so when alone with the child or when there is no obvious reason for doing so.

- **Digital Media**

Given the widespread use of digital media in schools, members of staff must be scrupulous about their digital communication with pupils – The Code of Conduct for all staff and staff handbooks contain detailed guidance.

Members of staff who need to communicate with pupils using digital media should do so only from and to authorised College email addresses, or using the isams system or Firefly VLE. Members of staff should use only College-issued mobile technology to communicate with pupils. Private web-based email addresses, or personal mobile phones should NOT be used, except in emergencies, or when agreed in advance with the Educational Visits Coordinator, e.g. on school trips. Members of staff should avoid communicating with pupils via social networking sites.

## **19.5 Allegations of abuse against teachers and other staff**

1. The College will manage cases of allegations in which it is alleged that a member of staff has:
  - behaved in a way that has harmed a child, or may have harmed a child;
  - possibly committed a criminal offence against or related to a child; or
  - behaved toward a child or children in a way that indicated he or she may pose a risk of harm to children;

according to the guidance set out in Part Four of Keeping Children Safe in Education September (2020) Update January 2021 (post EU Exit)

2. This guidance recognises:
  - The need to act consistently regardless of where or when the alleged abuse took place.
  - The duty of care to employees.
  - The need for common sense and judgement, and the need to act without delay to refer to Children's Social Care, the SVPP and/or police in the case of serious allegations, which meet the criteria above.
3. In the event of an allegation against a member of staff the Master (or Chairman of Council where the Master is subject of an allegation) – the 'Case Manager' will discuss the allegation immediately with the DSL. The purpose of the discussion is to consider the nature, content and context of the allegation and agree a course of action.
4. Where it is deemed that there is an immediate risk to children or there is evidence of a possible criminal offence, it is appropriate to involve the police immediately.

Initial information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern.

Any decision, and the justification for it, will be recorded by both the 'Case Manager' and the DSL. Consideration will then be given to the action to be taken in respect of the individual and the initiator(s) of the allegation.

In all cases the process in respect of;

- Supporting those involved
- Confidentiality
- Record Keeping
- Timescales
- Information sharing
- Oversight and monitoring
- Outcomes, actions, learning lessons

will follow the guidance set out in Part Four of Keeping Children Safe in Education September (2020) Update January 2021 (post EU Exit)

5. In cases of allegations that refer to possible abuse by members of staff or volunteers (e.g., sexual or physical abuse, criminal acts, acts of gross misconduct or any act where children are 'at risk'), the Wiltshire SVPP will be contacted by the Master or the DSL to refer the situation, within one working day.

He/She will make it clear that the referral is being made under the College's Child Protection Procedure and the report will be confirmed in writing, within 24 hours.

Following an allegation or suspicion of abuse, it is appropriate to seek the advice of the Wiltshire SVPP Designated Officer for Allegations (DOFA). This may be done informally and without giving names in the first instance, prior to referral. The school will never investigate an allegation prior to contact with the DOFA, in the first instance.

In either case, the College will endeavour to do nothing which may jeopardise a police investigation, such as asking a child leading questions or attempting to investigate the allegations of abuse.

6. If the complaint is considered sufficiently serious and following discussion with the Wiltshire SVPP Designated Officer for Allegations (DOFA), and involves a member of staff, that member of staff will be told that serious allegations of misconduct have been made. The member of staff will have the opportunity to answer the allegations and his/her contractual rights will remain in force. The member of staff concerned will continue to have access to the Master or Bursar, who will keep the member of staff informed of developments.
7. It may be that suspension from duty immediately pending a full investigation is the appropriate course of action although this is by no means automatic. A decision to suspend must be contextually risk assessed.
8. In a case of suspension from duty pending full investigation, it may be appropriate for the College to provide alternative accommodation for members of staff, outside of the boarding environment.
9. In the event of a criminal act being alleged, the Police will be contacted for their advice.
10. In all cases of complaint, decisions will be taken to ensure that the complaint is fully investigated quickly, and in a fair and consistent way, and resolved in such a way that is in the child's best interests, whilst at the same time supporting the person who is the subject of the allegation.
11. All serious complaints will be reported to the Chairman of the Council immediately, and subsequently all the Council Members (The College Council).
12. The College will report to the Disclosure and Barring Service (DBS), within one month of leaving the school any person (whether employed, contracted or a student) whose services are no longer used because he or she is considered unsuitable to work with children. In addition, consideration will be made to reporting to the TRA any teacher who has been dismissed or has left for whom a prohibition order may be appropriate because of unacceptable professional conduct.
13. The term 'child' shall be taken to indicate all pupils being educated at the College even if they are over 18 years of age.
14. The College does not employ Supply Staff for regulated activities, i.e. with direct contact with children.

#### **19.6 What happens when the child is back in the classroom?**

- Help the child to get as much privacy and to be as normal as possible.
- Be as observant as possible to spot the child being harassed by other children who know about the abuse and be prepared to intervene.
- Be prepared for the child's schoolwork and behaviour to be below their best.
- Recognise that a child with a compulsion to tell others what has happened to them needs counselling rather than censure.

#### **19.7 What are the signs of Child Abuse that members of staff should be alert to?**

The following should not be regarded as a comprehensive list, nor should any indicator on this list be regarded, when taken alone, as being a definitive sign of abuse. This is why it is crucially important to raise concerns promptly such that advice can be sought from experienced and expert agencies, working together for the best interests of the child.

## Physical

- unexplained injuries – perhaps improbable explanations (see Appendix D)
- fear of medical help
- fear of parents being contacted
- fear of returning home
- self-destructive tendencies – i.e., hatred for his/her own body
- desire to look as unsexual and unattractive as possible
- aggression towards others
- dislike of being touched or touching others
- chronic running away
- dirty, torn or threadbare clothing; inappropriate clothing for the season or context (sign of neglect)
- unwashed hair, dirty appearance, unclean smell
- excessive or uncontrollable tearfulness

## Signs of possible emotional abuse (in addition to some of above)

- A feeling of shame or guilt (“It must have been my fault . . .”)
- A feeling that he/she is dirty or degraded
- Embarrassment (“Perhaps there’s something wrong with me”)
- A desire to talk about a topic frequently (betraying a need for reassurance and a desire to get it out of the system)
- Nightmares or trouble with sleeping
- Compulsive stealing
- Neurotic behaviour
- Inappropriately adult or sexualised behaviour or inappropriately infantile behaviour

## Summary

- Be AWARE OF and ALERT TO signs of child abuse
- RECORD and REPORT any concerns
- CONSULT with HMs or with the Child Protection Co-ordinator if you are worried at any time.
- Above all remember that the CHILD’S INTERESTS ARE PARAMOUNT. If you are concerned act quickly but with discretion.

## Appendices

Appendix A	Addendum
Appendix B	Roles and Responsibilities of DSL and DDSLs
Appendix C	Pastoral Care Plan
Appendix D	Non-Accidental Injury: Signs of Possible Abuse
Appendix E	Child Protection Training – Pro forma for Academic and Pastoral Staff
Appendix F	Child Protection Training – Pro forma for Staff
Appendix G	Allegations against adults who work with children – Guidance Flowchart
Appendix H	Wiltshire Safeguarding Vulnerable People Partnership (SVPP): What to do if you are worried that a child is being abused or neglected
Appendix I	What is Child Protection? Poster for Staff Notice Boards

Appendix J	The Children Act (1989) Notes for Members of Common Room
Appendix K	College Confidentiality Statement
Appendix L	Occupancy Terms for Spouse/Partner and Dependents of Employees
Appendix M	Further information relating to specific safeguarding issues, including Forced Marriage and Female Genital Mutilation, CSE and CCE.

## Appendix A

### Marlborough College COVID 19 Safeguarding and Child Protection Policy Addendum

#### 1. Context:

Keeping Children Safe in Education remains in force throughout the response to coronavirus (COVID- 19).

This policy outlines procedures in place when the College is closed, that is, when parents are asked to keep their children at home wherever possible. In these circumstances, the College will follow government guidelines, but may remain open only for those children of workers critical to the COVID-19 response, who absolutely need to attend.

In such circumstances, Colleges and all childcare providers will be asked to provide care for a limited number of children - children who are vulnerable, and children whose parents are critical to the COVID-19 response and cannot be safely cared for at home.

These procedures also apply when the College is open but some pupils have had to remain at home in the Remote Learning Environment due to travel restrictions and quarantine regulations.

#### 2. Key contacts:

During College closure, contact details in response to Safeguarding concerns remain the same as outlined above.

#### 3. Vulnerable Children:

The College will refer to the Government guidance when defining assessing the vulnerability of pupils: <https://www.gov.uk/government/publications/coronavirus-covid-19-maintaining-educational-provision/guidance-for-Colleges-colleges-and-local-authorities-on-maintaining-educational-provision>

#### The main criteria may be seen below:

Vulnerable children and young people include those who:

- are assessed as being in need under section 17 of the Children Act 1989, including children and young people who have a child in need plan, a child protection plan or who are a looked-after child.
- have an education, health and care (EHC) plan.
- have been identified as otherwise vulnerable by educational providers or local authorities (including children's social care services), and who could therefore benefit from continued full-time attendance, this might include:
  - children and young people on the edge of receiving support from children's social care services or in the process of being referred to children's services
  - adopted children or children on a special guardianship order
  - those at risk of becoming NEET ('not in employment, education or training')
  - those living in temporary accommodation
  - those who are young carers

- those who may have difficulty engaging with remote education at home (for example due to a lack of devices or quiet space to study)
- care leavers
- others at the provider and local authority's discretion including pupils and students who need to attend to receive support or manage risks to their mental health

Pupils who are considered vulnerable will be allowed to return to the College. However, it is also recognised that some vulnerable pupils will also be able to remain safe at home.

The College will continue to work with and support children's social workers to help protect vulnerable children.

There is an expectation that vulnerable children who have a social worker will attend an education setting, so long as they do not have underlying health conditions that put them at risk. In circumstances where a parent does not want to bring their child to an education setting, and their child is considered vulnerable, the social worker and the College will explore the reasons for this directly with the parent.

The College will encourage our vulnerable children and young people to attend a College, including remotely if needed. Senior pastoral staff and Designated Safeguarding Leads, working with the College Medical Team and Counsellors know who our most vulnerable children are. Vulnerable pupils will be supported in a range of ways, depending on their individual circumstances.

- They may be offered the opportunity to attend onsite educational provision that the College continues to provide for the children of key workers, as well as for vulnerable children.
- Pastoral support will be offered to pupils attending College remotely, through emails and phone calls by pastoral staff.
- Contact will be made with the parents of vulnerable children, by pastoral staff, to check on pupil wellbeing.
- Counselling, via email, phone call or Zoom, will also be offered.
- The Acting Deputy Head (Pastoral) and Designated Safeguarding Leads, working with Pastoral Teams will maintain an overview of the vulnerable children ensuring that they are supported appropriately during remote learning.

#### **Attendance monitoring:**

- Local authorities and education settings do not need to complete their usual day-to-day attendance processes to follow up on non-attendance while College sites are in closure, though the College will complete the Government's daily online attendance form.
- Staff will be reminded to report unauthorised absence in the usual manner.
- HMs' will liaise with the Acting Deputy Head (Pastoral) and DSL when concerns about attendance in the Remote Learning Environment occur.
- Pastoral teams will work with parents and families to ensure the best possible engagement with the College's online learning provision.

#### **Designated Safeguarding Leads:**

- The Designated Safeguarding Lead and Deputies will continue to be available. The DSL and/or Deputies will continue to update and manage access to child protection files, liaising, as required, with children's social workers where they require access to children in need and/or to carry out statutory assessments at the College. The DSLs will continue to engage with social workers, and attend all multi-agency meetings, which can be done remotely.



### **Reporting concerns:**

- Staff should continue to follow the process outlined in the College's Safeguarding and Child Protection Policy. Staff are reminded of the need to report any concern about a pupil immediately and without delay. Recording of information on CPOMS is required.
- Where staff are concerned about an adult working with children in the College, they should report the concern to the Master.
- Concerns regarding The Master should be directed to the Chairman of Council (or in his absence, a nominated safeguarding Member of Council) using the contact details above.

### **Safeguarding training and induction:**

DSL training will continue in the event of the College being closed through remote means. During the period that COVID-19 measures are in place, a DSL (or Acting Deputy) who has been trained will continue to be classed as a trained DSL (or Acting Deputy) even if they miss their refresher training.

All existing staff have had safeguarding training and have read Part 1 of Keeping Children Safe in Education (2020). The DSL will communicate any new local arrangements to staff, so they know what to do if they are worried about a child.

Where new staff are recruited, or new volunteers join the College, they will continue to be provided with a safeguarding induction. They will be provided with all relevant safeguarding documents and will have the usual safeguarding briefing.

If staff are deployed from another education or children's workforce setting to the College, we will take into account the DfE supplementary guidance on safeguarding children during the COVID-19 pandemic and will accept portability as long as the current employer confirms in writing that:

- the individual has been subject to an enhanced DBS and Children's Barred List check
- there are no known concerns about the individual's suitability to work with children
- there is no ongoing disciplinary investigation relating to that individual.

Upon arrival, they will be provided with the College's usual Safeguarding Induction.

### **4. Safer recruitment/volunteers and movement of staff**

It remains essential that unsuitable people are not allowed to enter the children's workforce or gain access to children. When recruiting new staff, the College will continue to follow the relevant Safer Recruitment processes, including relevant Sections in Part 3 of Keeping Children Safe in Education (2020).

In response to COVID-19, the Disclosure and Barring Service (DBS) has made changes to its guidance on Standard and Enhanced DBS ID checking to minimise the need for face-to-face contact.

Where the College is utilising volunteers, it will continue to follow the Checking and Risk assessment process as set out in paragraphs 167 to 172 of Keeping Children Safe in Education (2020).

Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity. The College will continue to follow the legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult.

Full details can be found at paragraph 163 of Keeping Children Safe in Education (2020).

The College will continue to consider and make referrals to the Teaching Regulation Agency (TRA) as per paragraph 166 of Keeping Children Safe in Education (2020) and the TRA's 'Teacher misconduct advice for making a referral'. During the COVID-19 period all referrals should be made by emailing [Misconduct.Teacher@education.gov.uk](mailto:Misconduct.Teacher@education.gov.uk)

Whilst acknowledging the challenge of the current national emergency, from a safeguarding perspective, it is essential that on any given day, the College is aware of which staff/volunteers will be in College, and that appropriate checks have been carried out, especially for anyone engaging in regulated activity. As such, the College will continue to ensure that all staff, volunteers and essential visitors sign in and out of the premises appropriately and will continue to keep the Single Central Record (SCR) up to date as outlined in paragraphs 148 to 156 in Keeping Children Safe in Education (2020).

## **5. E-Safety:**

The College's E-Safety Officer is the Designated Safeguarding Lead, Richard Willmetts, who, working alongside the Second Master and Head of ICT, will ensure pupils stay as safe as possible in the Remote Learning Environment.

Advice issued to pupils in this regard can be found here:  
<https://www.marlboroughcollege.org/wp-content/uploads/2020/04/Pupils-Safeguarding-in-the-Remote-Learning-Environment-1.pdf>

Resources on E-Safety for pupils will also be made available and can be found here:  
<https://firefly.marlboroughcollege.org/pupils---resources/e-safety>

Advice for Parents on E-Safety issues can be found on the College website here:  
<https://www.marlboroughcollege.org/parents/online-safety/>

The College will continue to ensure that appropriate filters and monitoring systems are in place to protect pupils when they are online on the College's IT systems and as far as is possible, checks are made on all recommended resources.

It is important that all staff who interact with children, including online, continue to look out for signs that a child may be at risk. Any such concerns should be dealt with in line with the College's Safeguarding Policy and where appropriate, referrals should still be made to Children's Social Care and, as required, the Police.

The College will ensure any use of online learning tools and systems is in line with Privacy and Data Protection/GDPR requirements.

All advice given to Staff regarding Safeguarding and the Remote Learning Environment will be made available on Firefly and can be found here:

<https://firefly.marlboroughcollege.org/safeguarding--for-all-staff/safeguarding-in-the-rle>

## **6. Supporting children not in College:**

The College is committed to ensuring the safety and wellbeing of all its pupils. With the vast majority of pupils accessing the College provision remotely, it is very important that the College continues to provide pastoral care for all its pupils. The are examples of pastoral points of contact that will exist:

- Check-ins
- PSHEE sessions and talks
- Assemblies
- House Assemblies
- Weekly Tutor meetings
- Regular communications and updates from the Master and SMT

Advice given to parents may be found here: <https://www.marlbroughcollege.org/wp-content/uploads/2020/04/Parents-Safeguarding-Guidelines-for-Continuation-of-School-Provision-by-Virtual-Learning.pdf>

## **7. Supporting children in College:**

The College is committed to ensuring the safety and wellbeing of all its pupils. The College will continue to be a safe space for all children to attend and flourish.

Appropriate staff are on site and that staff to pupil ratio numbers are appropriate.

The College will refer to the Government Guidance for Education and Childcare Settings on how to implement social distancing and continue to follow the advice from Public Health England on handwashing and other measures to limit the risk of spread of COVID-19.

The College will ensure that appropriate support is in place for those children of critical workers and for vulnerable children on site.

## **8. College leavers and joiners:**

The College will continue to adhere to the Children Missing Education Policy as published on the College website.

The College will continue to have appropriate regard to Data Protection and GDPR and is aware that it should not prevent the sharing of information for the purposes of keeping children safe.

## **9. Mental health:**

The College is aware that negative experiences and distressing life events such as College closure and the current circumstances can affect the mental health of pupils and their parents.

The College will ensure that appropriate support is in place for the children of critical workers and vulnerable children whilst on site.

The College will continue to offer support to pupils who are not on site; this will be done remotely or by phone.

The College will ensure that all pupils have contact details for appropriate Support Services: they all know how to contact key Pastoral staff.

The College will make available appropriate resources and information to support pupils and families with their mental health and well-being. A link to these may be found here:

<https://www.marlbroughcollege.org/mental-health-resources/>

## **10. Peer on Peer Abuse:**

The College will follow the principles as set out in Keeping Children Safe in Education (2020) Update January 2021 (post EU Exit), its' Safeguarding and Child Protection Policy and its' Peer-on-Peer Abuse Policy.

The College will listen and work with the young person, parents/carers and any MASH partner required to ensure the safety and security of that young person. Concerns and actions must be recorded using the College's procedure and appropriate referrals made.

## **11. Staff Behaviour and Low Level Concerns:**

The Safeguarding of the pupils and importance of maintaining professional boundaries is just as relevant when delivering lessons via digital remote learning as it is in face-to-face teaching.

To ensure that the College continues to keep the welfare and safety of our pupils and staff at the forefront of the education provided, staff are required to be regularly reflective of their own professional boundaries.

Members of staff are in a position of trust at the College and must act in a way that is, at all times, appropriate, transparent and upholds the highest professional standards. Staff should understand the correct procedures and make the appropriate report, should they become concerned about a pupil or the actions of a member of Staff.

Members of staff should self-report, by contacting the Master, DSL or member of the Senior Management Team if:

- They are concerned that they have been in a situation which might appear compromising to others or which could be misconstrued.
- That they may, for whatever reason have behaved in a manner which on reflection he/she considers falls below the standard set out in the Code of Conduct for staff and volunteers with relation to Children and Young People.

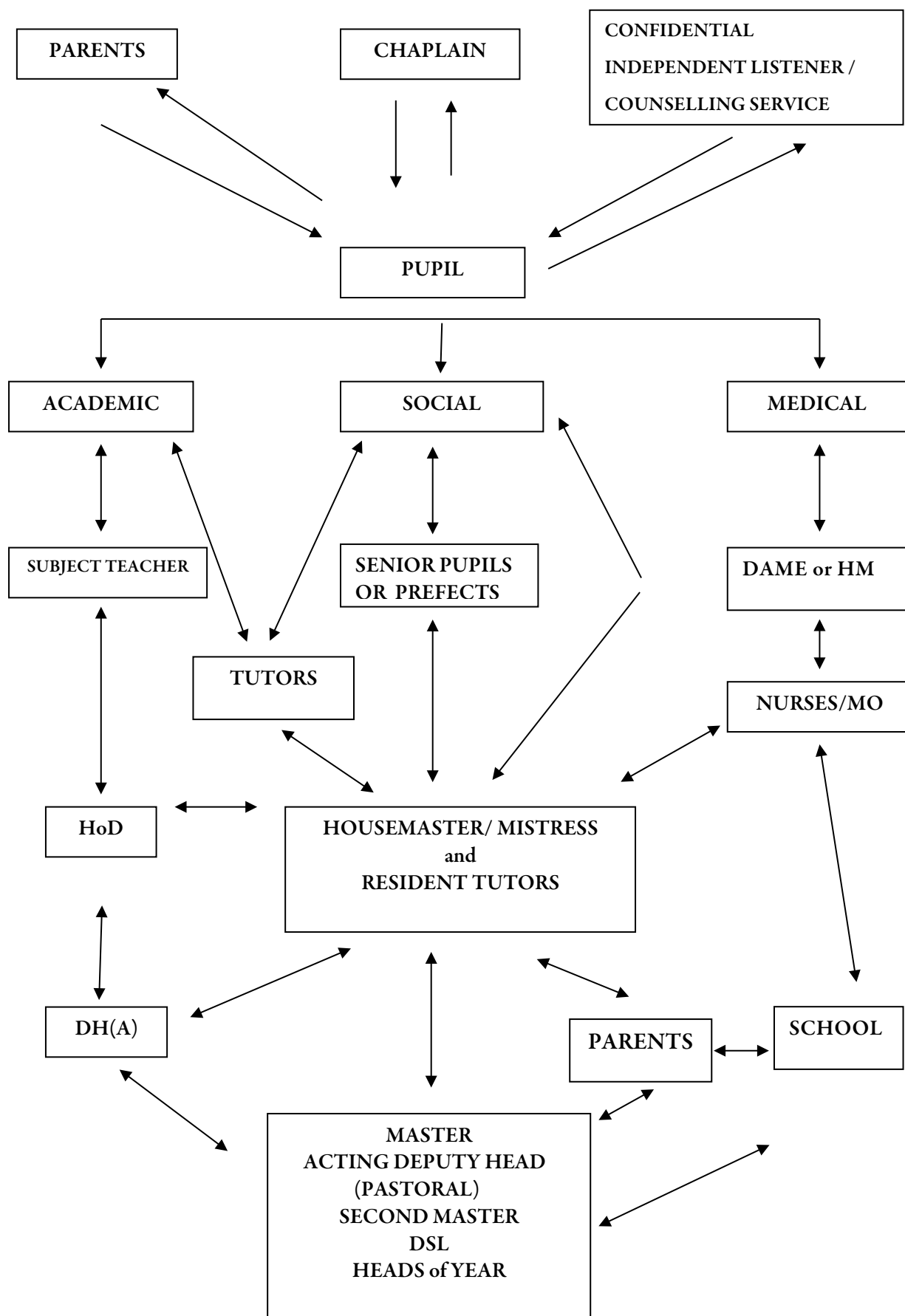
Self-reporting in these circumstances is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how these might be perceived.

## Appendix B

Name	Role	Responsibilities
Mr R Willmet	Designated Safeguarding Lead	DOFA, Low Level Concerns, E-Safety, CME, CTFs, Staff Training. Bursary Pupils, Young Carers, Looked after Children.
Mrs J Hodgson	Acting Deputy DSL	Mental Health, CME, CTFs.
Mr J Hodgson	DSL	Teaching of Safeguarding, PSHEE, Pupil Training.
Mrs Q Li	DSL	Private Fostering, International Pupils.
Mrs H Marvin	DSL	TA - HSBs, SH and SV.
Mr J Blake	DSL	Prevent Lead, Summer School.

## Appendix C

### Pastoral Care Plan PUPIL SUPPORT SYSTEM STRUCTURE



## Appendix D

### Non-Accidental Injury: Signs of Possible Abuse

Common Sites for Non-Accidental Injury	Common Sites for Accidental Injury
Eyes – bruising, black (particularly both eyes)	Forehead
Cheek/side of face – bruising, finger marks	Nose
Mouth – torn frenulum	Chin
Shoulders – bruising grasp marks	Bony spine
Genitals – bruising	Elbows
Knees – grasp marks	Forearm
Skull – fracture, bruising or bleeding under skull (from shaking)	Hip
Ears – pinch or slap marks – bruising or grasp marks	Knees
Upper and inner arms – bruising or grasp marks	Shins
Chest – bruising or grasp marks	
Back Buttocks Thighs	inner bruising outline of belt/buckles scalds/burns

Non-Accidental Injuries	Accidental Injuries
Bruises - likely to be: frequent/patterned e.g., finger and thumb marks/ old and new in same place (note colour)/in unusual position. Consider: development of child and their activities/may be more difficult to see on darker skins.	Bruises - likely to be: few but scattered/no pattern/same colour and age. Consider: age and activity of child e.g. may be confused with birthmarks or other skin conditions.
Burns and Scalds – likely to have: clear outline/splash marks around burn area/unusual position e.g. back of hand/indicative shapes e.g. cigarette burns, bar of electric fire.	Burns and Scalds – likely to be: treated/easily explained, may be confused with other conditions e.g. impetigo.
Injuries suspicious if: bite marks/fingernail marks/large and deep scratches/incisions e.g. from razor blades	Injuries likely to be: minor and superficial/treated/easily explained.
Fractures likely to be: numerous – healed at different times. Consider: age of child/delay in seeking treatment.	Fractures likely to be: of arms and legs/seldom on ribs except for road traffic accidents/ rarely may be due to 'brittle bone syndrome'.
Sexual abuse may result in: unexplained soreness, bleeding or injury to genital or anal area/sexually transmitted disease.	Genital area injury may be accidental – (seek expert advice) –soreness/irritation e.g. from bubble bath/anal soreness may be due to constipation or threadworm infestation.

**PARENTAL ATTITUDE IS IMPORTANT IN ASSESSING ALL OF THE ABOVE.**

**WHEN A CHILD IS SUFFERING A SEVERE AND PAINFUL INJURY MOST WOULD SEEK MEDICAL HELP.**

## Appendix E

## Safeguarding and Child Protection Briefing – Academic and Pastoral Staff

As a boarding school, Marlborough College is bound by the provision of several key pieces of legislation, to ***“safeguard and promote the welfare”*** of children in its care.

First among these is the Children Act (1989), which was updated in 2004 to include the recommendations of the Green Paper “Every Child Matters”.

The Act identifies five key welfare outcomes for children and young people:

- Being healthy
- Staying safe
- Enjoying and achieving
- Making a positive contribution
- Economic well-being

This and other legislation were incorporated into Keeping Children Safe in Education September (2020) Update January 2021 (post EU Exit) Statutory Guidance for Schools, which includes details on key safeguarding issues such as Abuse and Peer on Peer Abuse, Prevent, Forced Marriage, Mental Health, Child Criminal and Sexual Exploitation and Serious Violence. Part 1 of KCSIE is issued to all staff.

In addition, a set of National Minimum Standards for Boarding exist, last updated March 2015 which incorporate these outcomes, and it is these standards that form the basis for the College’s **“Duty of Care”** towards its pupils.

**It is the responsibility of all staff to share this duty of care to *“safeguard and promote the welfare”* of the College’s pupils.**

The ***promotion*** of pupil welfare is achieved by providing opportunities for satisfactory development and growth across a broad range: social, moral, spiritual, emotional, physical and intellectual.

The ***safeguarding*** of pupil welfare is achieved in two ways:

- Reasonable measures to minimise risks of harm. This includes risks of accident or injury, or risks of being abused, bullied, being lost or being taken.
- Taking appropriate actions to address concerns about welfare

In its widest sense, therefore, Safeguarding involves many aspects of the College’s work, including

- Health and Safety issues, including medical care
- Staff recruitment, induction and training
- Pastoral Care system
- Grievance procedures
- Accommodation and physical plant

Child Protection is what we do in conjunction with external agencies when a child is regarded to be suffering, or likely to suffer, significant harm

**All staff** have a responsibility to ensure that in their day-to-day work, pupil welfare is safeguarded by their **knowledge, understanding and actions**. What follows is presented as a Safeguarding and Child Protection Checklist for members of staff. Beaks are encouraged to use the list as a way of self-auditing their own awareness of Safeguarding, and updating, where necessary, their familiarity with relevant aspects of College policies and administration. The most up-to-date version of the CR Handbook is available on Firefly and the College’s Policies are found on the College Website and A-Z Policies, Firefly

## CR Checklist



Name:.....Signature:.....Date:.....

**Knowledge: I am aware ...**

	That it is the responsibility of <b>all staff</b> to share the duty of care to “ <i>safeguard and promote the welfare</i> ” of the College’s pupils
	That the Designated Safeguarding Lead is the Acting Assistant Head (Safeguarding), Mr Richard Willmet.
	What to do in the event of a pupil disclosing information to me about abuse, if I have concerns about abuse, or if I receive an allegation of abuse; What to do in the event of <b>any</b> concern about the welfare of a child, i.e. act promptly and directly such that the concern is addressed; That <b>any</b> member of staff can make a direct referral to the statutory agencies (Wiltshire SVPP, MASH, Police) in the event of an immediate risk to the welfare of a child. That any such referral should be reported immediately to the Designated Safeguarding Lead. <b>See Summary diagram in the S &amp; CP Policy, on the Pastoral Notice Board, Common Room, or Staff Common Rooms in boarding houses.</b>

**Action:**

	Read the <b>Emergency Medical List</b> on Firefly and CR Noticeboard in respect of pupils you deal with, and amend your professional records accordingly.
	Read the <b>Special Circumstances List</b> on Firefly and amend your professional records accordingly. (NB List issued week 2 of Mich Term and Lent Term)
	Seek training as appropriate: e.g. Using an Epipen, Emergency First Aid in Schools, specific pastoral training.
	Ensure you are familiar in Houses with your House Tutor Handbook that includes emergency procedures, fire procedure etc. <b>See your HM for details.</b>

**Reading and Understanding: I have read and understood...**

What?	Where found?
The College’s Statement of Boarding Principles and Practice / Pastoral Aims.	College Website & Firefly
The College’s Policy on Confidentiality	College Website & Firefly
The College’s Safeguarding and Child Protection Policy that includes the Standing Guidelines on Child Abuse Matters and Appendix D: Non-accidental injury: Signs of possible abuse.	College Website & Firefly
Keeping Children Safe in Education September (2020) Update January 2021 (post EU Exit) and completion of KCSIE Questionnaire.	Induction Folder and Firefly
The “Child Protection Guidelines” laminated card	Issued to Staff
Code of Conduct for Staff and Volunteers with relation to Children and Young People.	Firefly
The College’s Behaviour Management, Countering Bullying and Peer on Peer Abuse Policies	College Website & Firefly
Children Missing Education and Supervision Policies	College Website & Firefly
Policies on E-Safety, ICT and Social Media	College Website & Firefly

**Appendix F**

## Safeguarding and Child Protection Briefing – Staff

As a boarding school Marlborough College is bound by the provision of several key pieces of legislation, to “*safeguard and promote the welfare*” of children in its care.

First among these is the Children Act (1989), which was updated in 2004 to include the recommendations of the Green Paper “Every Child Matters”.

The Act identified five key welfare outcomes for children and young people:

- Being healthy
- Staying safe
- Enjoying and achieving
- Making a positive contribution
- Economic well-being

This and other legislation was incorporated into Keeping Children Safe in Education (September 2020) – Statutory Guidance for Schools, which include details on key safeguarding issues such as Abuse and Peer on Peer Abuse, Prevent, Forced Marriage, Mental Health, Child Criminal and Sexual Exploitation and Serious Violence. Part 1 of KCSIE is issued to all staff.

In addition, a set of National Minimum Standards for Boarding exist, last updated in March 2015, which incorporate these outcomes, and it is these standards that form the basis for the College’s “**Duty of Care**” towards its pupils.

**It is the responsibility of all staff to share this Duty of Care to “*safeguard and promote the welfare*” of the College’s pupils.**

The *promotion* of pupil welfare is achieved by providing opportunities for satisfactory development and growth across a broad range: social, moral, spiritual, emotional, physical and intellectual.

The *safeguarding* of pupil welfare is achieved in two ways:

- Reasonable measures to minimise risks of harm. This includes risks of accident or injury, or risks of being abused, bullied, being lost or being taken.
- Taking appropriate actions to address concerns about welfare

In its widest sense, therefore, **Safeguarding** involves many aspects of the College’s work:

- Health and Safety issues, including medical care
- Staff recruitment, induction
- Safeguarding training
- Pastoral Care system
- Grievance procedures
- Accommodation and physical plant

Child Protection is what we do in conjunction with external agencies when a child is regarded to be suffering or likely to suffer significant harm.

**All staff** have a responsibility to ensure that in their day-to-day work, pupil welfare is safeguarded by their **knowledge, understanding and actions**. What follows is presented as a Safeguarding and Child Protection Checklist for members of staff. Members of staff are encouraged to use the list as a way of self-auditing their own awareness of Safeguarding and updating, where necessary their familiarity with relevant aspects of College policies and administration. The most up-to-date version of the College’s Policies are found in the Pastoral Section of Firefly and on the College Website.

## Child Protection - Staff Checklist

Name:.....Signature.....Dept:.....Date.....

### Knowledge: I am aware ...

	That it is the responsibility of <b>all staff</b> to share the duty of care to “ <i>safeguard and promote the welfare</i> ” of the College’s pupils
	That the Designated Safeguarding Lead is the Acting Assistant Head (Safeguarding), Mr Richard Willmet
	What to do in the event of a pupil disclosing information to you about abuse, if you have concerns about abuse, or if you receive an allegation of abuse. What to do in the event of <b>any</b> concern about the welfare of a child, i.e. act promptly and directly such that the concern is addressed; That <b>any</b> member of staff can make a direct referral to the statutory agencies (Wiltshire SVPP, MASH, Police) in the event of an immediate risk to the welfare of a child. That any such referral should be reported immediately to the Designated Safeguarding Lead. <b>See Summary diagram in the S &amp; CP Policy, on the Pastoral Notice Board, Common Room or Staff Common Rooms in boarding houses.</b>

### Action: I have acted in order ...

	To be aware of appropriate Health and Safety procedures in respect of the area in which I work
	Seek training as appropriate e.g. Using an Epipen, Emergency First Aid in Schools, specific pastoral training → <b>See your Line Manager for details.</b>
	To ensure I am familiar with emergency procedures, routines, fire procedure etc. and update myself regularly → <b>See your Line Manager for details.</b>

### Reading and Understanding: I understand ...

	What?	Where found?
	The College’s Statement of Boarding Principles and Practice / Pastoral Aims.	College Website & Firefly
	The College’s Policy on Confidentiality	College Website & Firefly
	The College’s Safeguarding and Child Protection Policy that includes the Standing Guidelines on Child Abuse Matters and Appendix D: Non-accidental injury: Signs of possible abuse.	College Website & Firefly
	Keeping Children Safe in Education September (2020) Update January 2021 (post EU Exit) and completion of KCSIE Questionnaire.	Induction Folder and Firefly
	The “Child Protection Guidelines” laminated card	Issued to Staff
	Code of Conduct for Staff and Volunteers with relation to Children and Young People.	Firefly
	The College’s Behaviour Management, Countering Bullying Policies Peer on Peer Abuse Policy.	College Website & Firefly Firefly
	Children Missing Education Policy Supervision Policy	Firefly College Website & Firefly
	Policy on E-Safety ICT and Social Media Policies	College Website & Firefly Firefly

## Allegations against adults who work with children

**If you become aware that a member of staff/volunteer may have:**

- behaved in a way that **has harmed** a child, or **may have harmed** a child;
- possibly committed a **criminal offence** against or related to a child or
- behaved towards a child or children in a way that indicates they **may pose a risk of harm** to a child
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.



**Where a young person discloses abuse or neglect**

- Listen; take their allegation seriously; reassure that you will take action to keep them safe.
- Inform them what you are going to do next
- Do not promise confidentiality
- Do not question further or approach/inform the alleged abuser



**Report immediately to your /a senior manager/safeguarding lead.**

Unless there is clear evidence to prove that the allegation is incorrect **the manager/safeguarding lead must:**



**Report the allegation within one working day to the Designated Officer for Allegations or DOFA (formerly known as LADO):**

- Contact the Multi-agency Safeguarding Hub (MASH): **0300 456 0108** and Select Option 3 then Option 4
- Or email [dofaservice@wiltshire.gov.uk](mailto:dofaservice@wiltshire.gov.uk)
- Out of Hours Emergency Duty Service (5.00pm to 9.00am Weekdays, 4:00pm Friday to 9:00am Monday): **0300 456 0100**



**The Designated Officer will:**

1. Consider the relevant facts and concerns regarding the adult and child or children, including any previous history.
2. Decide on next course of action – usually straight away, sometimes after further consultation with other multi-agency parties such as the Police and HR.



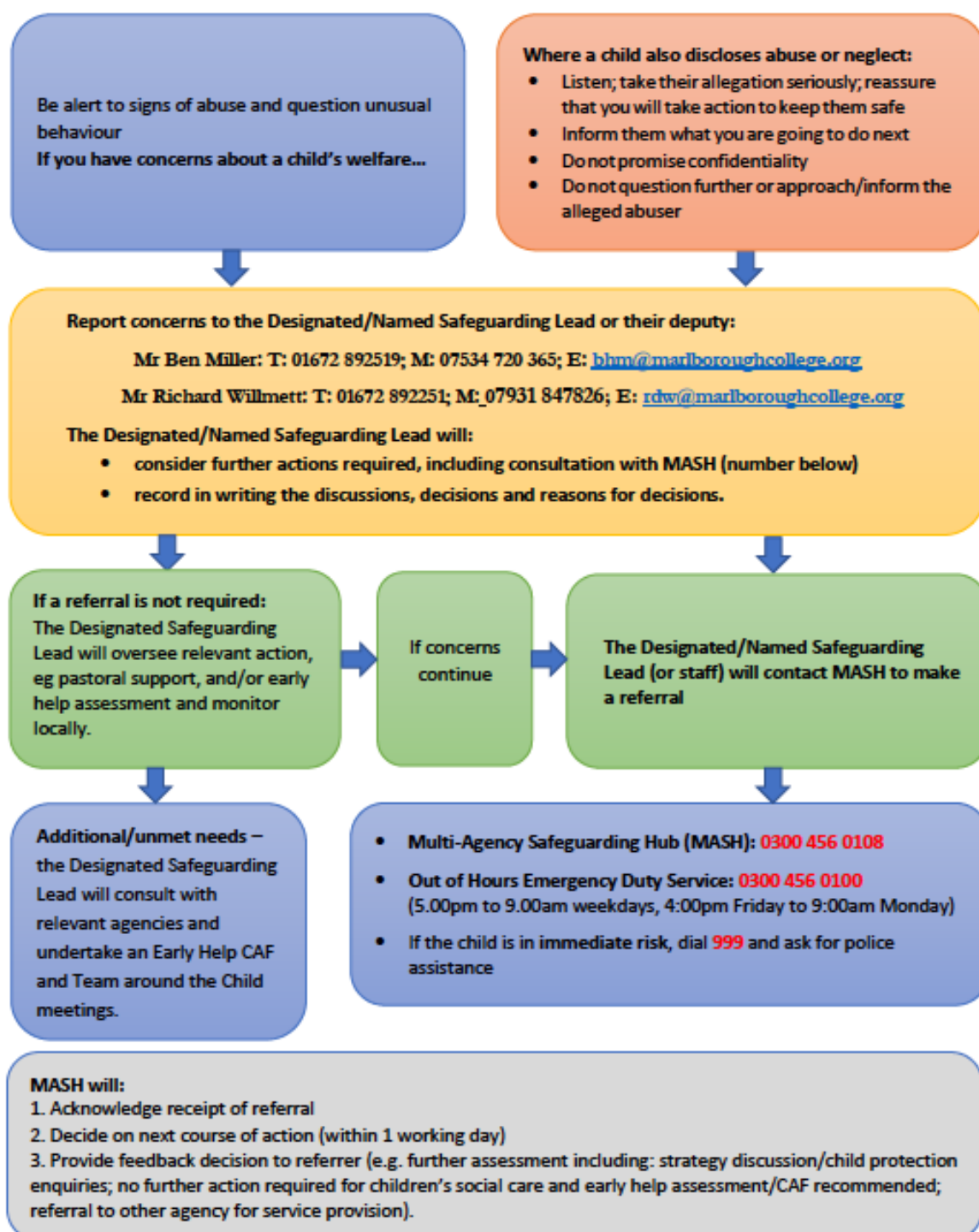
**If the allegation threshold is NOT met**, the Designated Officer will agree with you an appropriate response (*e.g. for the agency to undertake further enquiries or undertake an internal investigation*).



**If the allegation threshold is met** a strategy meeting will normally be held either by phone or in person. Normally a senior manager/safeguarding lead, the Designated Officer, HR, Police and social care are invited to attend. Relevant information is shared, risks to children are considered and appropriate action agreed – e.g. child protection and other enquiries, disciplinary measures or criminal proceedings. A record of the meeting will be made, and regular reviews will take place until a conclusion is reached.

## Appendix H

### What to do if you are worried a child is being abused or neglected for staff, volunteers and visitors in all agencies and settings



This flowchart is intended for use as a brief guide. Refer to the DfE Guidance [What to do if you are worried a child is being abused](#) for more information, definitions and possible indicators of abuse (including child sexual exploitation).

SVPP website: [www.wiltshirescb.org.uk](http://www.wiltshirescb.org.uk)

Reviewed: September 2020



MARLBOROUGH COLLEGE

## ***What is Child Protection?***

Child Protection covers the prevention of harm to anyone aged 18 or under through:

- neglect
- physical injury
- sexual abuse
- emotional abuse

caused by an adult or adolescent.

If you have ANY concerns about Child Protection issues at Marlborough College please speak to:

***Your Line Manager →***

He/she will refer this immediately to the Designated Safeguarding Lead, Richard Willmet (892519).

***Immunity from disciplinary action against such staff for 'whistle blowing' in good faith is assured.***

## Appendix J

# THE CHILDREN ACT (1989)

### *Notes for All Members of Common Room*

As a Boarding School Marlborough College is bound by the provision of several key pieces of legislation relating to the care of children.

First among these is the Children Act (1989), which was updated in 2004 to include the recommendations of Green Paper *Every Child Matters*. These derived from the conclusion of the Laming Report, and identify five key outcomes for children and young people:

Being Healthy  
Staying Safe  
Enjoying and Achieving  
Making a positive contribution  
Economic well-being

The Children Act is a wide reaching Act and each County SCB is responsible for ensuring that its provisions are implemented in boarding schools within its area. In 2000, the Care Standards Act amended the original 1989 Children Act and in 2002, and again in 2011 and 2013, a set of National Minimum Standards were produced, against which boarding schools should be inspected and regulated. Social Services Departments gave responsibility for inspection of social care to the Commission for Social Care Inspection (CSCI) and from 2007, to OFSTED. This role in respect of boarding schools has subsequently been taken on by the Independent Schools Inspectorate (ISI).

The National Minimum Standards (NMS) are intended to safeguard and promote the welfare of children for whom accommodation is provided by a boarding school. There are 20 Standards in total and throughout the Common Room and HM handbooks we indicate the standards being addressed. The Standards can be “mapped” against the Every Child Matters outcomes. A copy of the NMS can be downloaded from [www.dh.gov.uk](http://www.dh.gov.uk). Every Child Matters documentation can be viewed at [www.education.gov.uk](http://www.education.gov.uk) or see BHM for further details of these or other pastoral issues. The following notes are intended to summarise the gist of the most important provisions of the Children Act. It is hoped that they will of particular help to relatively new teachers.

- 1) Staff need to be aware of the importance of boarding as a way of developing independence and self-reliance in pupils and in fostering the personal and social development of boarders. In order to achieve these aims, however, it has to be recognised that the boarding environment must be secure and supportive, providing standards of care and supervision adequate to the needs of each particular age-group.
- 2) While HMs are ultimately responsible to the Master for the overall welfare of each pupil in their care, all teachers and other staff, whether or not they live or work in boarding houses, have a duty to be aware of good boarding practice and to be alert for signs of its abuse. To this end staff should be conscious of the following points:
- 3)
  - a) The School must be sensitive to the feelings of individuals and of minorities and must ensure equal opportunities, irrespective of religion, ethnic origin, cultural background, gender, sexual orientation, special educational needs, disability.

- b) Staff must be aware that pupils may suffer neglect, physical, sexual or emotional abuse and be alert for possible signs (changes of mood, drop-off of academic work etc).  
If there is cause for concern – however slight – information should be passed on immediately to the pupil's HM and to the Designated Safeguarding Lead/Child Protection Co-ordinator.
- c) It is important that all teaching staff should be well acquainted with the School Rules (as published in the Almanac) and be aware of areas which are out of bounds.
- d) All teaching staff must know the standard school discipline sanctions and apply them as consistently and fairly as possible. They should also be conversant with the formal Complaints Procedures for pupils (as published on House Boards).
- e) Members of Common Room need to be conscious of their duty to do everything to promote a healthy life-style for pupils. In particular this should include the encouragement of sensible sleeping, work and dietary habits and an awareness of the dangers of the misuse of alcohol and drugs and of smoking.
- f) All staff must be prepared to take and make opportunities to talk to and to listen to children. Staff should encourage discussion such that matters of e.g. complaint, bullying, unhappiness etc. can be openly aired.
- g) Good schools have caring teachers. Perhaps the most obvious everyday way in which we can demonstrate this care lies in the effort we put in to our routine teaching, in the prompt and accurate marking of written work and in the encouragement, we give our pupils, both inside and outside classrooms.

LJMH

2020



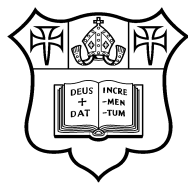
# *Confidentiality*

It is expected of each member of staff that he or she will exercise their role in the community with the utmost regard for the welfare, rights and safety of each pupil. To that end, it is understood that there will be many situations where the teacher or tutor will feel that they should be particularly sympathetic and supportive, and this is most likely to occur in one-to-one situations. It is therefore of paramount importance that adults never place themselves in the position of promising complete confidentiality when, for example, in circumstances of child abuse, bullying, substance abuse and life-threatening situations, to do so would be totally inappropriate. In such and similar cases, it is obligatory for matters to be reported to the HM or the Master, and to the Acting Assistant Head (Safeguarding) as Child Protection Co-ordinator. In cases of doubt, unofficial advice can be sought first from any member of the Senior Management Team or the Chaplain.

LJMH

September 2020

## Appendix L



# MARLBOROUGH COLLEGE

## OCCUPANCY CONDITIONS FOR SPOUSE/PARTNER AND DEPENDENTS OF EMPLOYEES

Dated:

### WHEREAS

- (1) You occupy «**Address**»('the Accommodation') as the spouse, partner or an adult (over 16) dependent of «**Name\_of\_Employee**»('the Employee'). The licence to occupy the Accommodation is personal to the Employee and is governed by the Service Occupancy Agreement between the Employee and the College. Your occupation of the Accommodation is contingent upon the Employee's continuing occupation of the Accommodation and continuing employment with the school.
- (2) For the avoidance of doubt, you have no occupancy rights if the Employee leaves the Accommodation or is no longer employed by the College or, in the case of a spouse or partner, where there is a breakdown in your relationship with the Employee. You are also bound by the provisions of the said Service Occupancy Agreement whilst you occupy the Accommodation.

### YOU HEREBY AGREE

1. Your occupancy of the Accommodation is subject to completing an enhanced disclosure with the Disclosure and Barring Service, where appropriate, to the College's satisfaction.
2. Your occupancy of the Accommodation may be disallowed or terminated if in the College's reasonable view there is evidence to suggest that you are unsuitable to have regular contact with children.
3. You are required to notify the Director of Corporate Resources or Master if you are charged with or convicted of any criminal offence.
4. You will not, without the consent of the College, permit any other occupant to occupy the Accommodation. You will be responsible for the conduct and behaviour of all your visitors and guests and you will ensure that they have no unsupervised access to pupils of the College during their visit.
5. Unless you are remunerated by the College to assist with pupil welfare your contact with boarders is to comply with the following guidelines:
  - You should not routinely be alone with any pupil except in an emergency where health or safety is at risk.

- Any involvement with pupils' activities must be agreed beforehand with the House Master/Mistress
- You are not in any circumstances to be in the pupils' sleeping accommodation areas at any time unless accompanied by the Employee or House Master/Mistress.

6. During your occupation of the Accommodation you agree to:

- Avoid any excessive noise, antisocial behaviour or any activity that might reasonably create a nuisance or cause complaints from neighbours within or outside the College.
- Take reasonable care of the Accommodation and of any contents that are the property of the College.
- Abide by the College's policies including those regarding health and safety, smoking on site and for the provision of meals for staff.

7. You acknowledge and agree that no independent rights are intended to be nor are granted to you to reside in the Accommodation under this agreement and that you are obliged to vacate the Accommodation when the Employee's employment is terminated or if reasonably required by the College.

Signed .....

Name «Name\_of\_Resident» (Occupant)

Signed by the Bursar on behalf of Marlborough College

.....

## Appendix M

### Further information relating to specific safeguarding issues

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example, the NSPCC offers information for schools and colleges via its website [www.nspcc.org.uk](http://www.nspcc.org.uk). Other information can be found on the TES and MindEd websites.

Schools and colleges can also access broad government guidance on the issues listed below via the GOV.UK website:

- child sexual exploitation (CSE) and child criminal exploitation (CCE)
- children missing education
- children missing from home or care
- bullying including cyberbullying
- domestic violence
- drugs / ‘county lines’
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM) – see also below
- forced marriage – see also below
- gangs and youth violence; involvement in serious violent crime
- gender-based violence/violence against women and girls (VAWG)
- mental health
- private fostering
- radicalisation
- sexting
- ‘upskirting’ – taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, alarm or distress
- teenage relationship abuse
- trafficking

### Honour Based Violence (HBV) - Forced Marriage (FM)

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the free and full consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage.

This is an entirely separate issue from arranged marriage. It is a human rights abuse and falls within the Crown Prosecution Service definition of domestic violence. Young men and women can be at risk in affected ethnic groups. Whistle-blowing may come from younger siblings. Other indicators may be detected by changes in adolescent behaviours. Never attempt to intervene directly as a school or through a third party.

Staff with safeguarding concerns in relation to forced marriage should consult with the DSL.

Depending on the immediacy of the risk, they can also consult directly with the Forced Marriage Unit on 020 7008 0151 or email [fmu@fco.gov.uk](mailto:fmu@fco.gov.uk) or contact the Police.

## **Honour Based Violence (HBV) - Female Genital Mutilation (FGM)**

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM.

Section 5B of the Female Genital Mutilation Act 2003 places a **statutory duty** upon staff (teachers and medical staff) to report to the police (either through disclosure by the victim or by visual evidence) that FGM appears to have been carried out on a girl under 18. Staff **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out.

Those failing to report such cases will face disciplinary sanctions.

It will be rare for teachers to see visual evidence and they should **not** be examining pupils, but the same definition of what is meant by 'to discover that an act of FGM appears to have been carried out' is used for all professionals to whom this mandatory reporting duty applies.

It would be usual for concerns about FGM to be discussed with the DSL, and for children's social care to be involved alongside a report made using the procedures outlined in the document:

### **Mandatory reporting of female genital mutilation procedural information**

## **What is FGM?**

It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

There are, commonly, four types of procedure:

Type 1 Clitoridectomy – partial/total removal of clitoris

Type 2 Excision – partial/total removal of clitoris and labia minora

Type 3 Infibulation – entrance to vagina is narrowed by repositioning the inner/outer labia

Type 4 – all other procedures that may include : pricking, piercing, incising, cauterising and scraping the genital area

## **Why is it carried out?**

Belief that:

- FGM brings status/respect to the girl – social acceptance for marriage
- Preserves a girl's virginity
- Part of being a woman / rite of passage
- Upholds family honour
- Cleanses and purifies the girl
- Gives a sense of belonging to the community
- Fulfils a religious requirement
- Perpetuates a custom/tradition
- Helps girls be clean/hygienic
- Is cosmetically desirable
- Mistakenly believed to make childbirth easier

## Is FGM legal?

FGM is internationally recognised as a violation of human rights of girls and women. It is **illegal** in most countries, including the UK.

### Circumstances and occurrences that may point to FGM happening:

- Child talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesian and Pakistan)
- Knowledge that the child's sibling has undergone FGM
- Child talks about going abroad to be 'cut' or prepare for marriage

### Signs that may indicate a child has undergone FGM:

- Prolonged absence from school and other activities
- Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued
- Bladder or menstrual problems
- Finding it difficult to sit still and looking uncomfortable
- Complaining about pain between the legs
- Mentioning something somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group
- Reluctance to take part in physical activity
- Repeated urinal tract infection
- Disclosure

## The 'One Chance' Rule

As with Forced Marriage there is the 'One Chance' rule. It is essential that settings/schools/colleges take action **without delay**.

## Child Sexual Exploitation / Child Criminal Exploitation

### What is CSE / CCE?

CSE and CCE are types of abuse. When a child or young person is exploited, they are given things like gifts, drugs, money, status and affection, in exchange for performing sexual or criminal activities. Children and young people are often tricked into believing they're in a loving and consensual relationship. This is called [grooming](#). They may trust their abuser and not understand that they're being abused.

Children and young people can be [trafficked](#) into or within the UK to be sexually or criminally exploited. They are often moved around the country and abused by being forced to take part in sexual activities, often with more than one person, or criminal activities. Young people in gangs can also be sexually or criminally exploited.

Sometimes abusers use violence and intimidation to frighten or force a child or young person, making them feel as if they've no choice. They may lend them large sums of money they know can't be repaid or use financial abuse to control them.

Perpetrators of CSE and CCE can be any age, gender or race. The relationship could be framed as friendship, someone to look up to or romance. Children and young people who are exploited may also be used to 'find' or coerce others to join groups.

As with other safeguarding risks, some children may be more vulnerable to exploitation; these include children with additional learning needs, or disabilities, or those with mental health issues, or low social and self-esteem, or adverse childhood experiences.

Early identification of risk, a network of supportive and trusted adults, early help to address additional needs can help to mitigate the risk of exploitation.

## **Types of CSE**

CSE can happen in person or [online](#). An abuser will gain a child's trust or control them through violence or blackmail before moving onto [sexually abusing](#) them. This can happen in a short period of time.

When a child is sexually exploited online they might be persuaded or forced to:

- send or post sexually explicit images of themselves
- film or stream sexual activities
- have sexual conversations.

Once an abuser has images, video or copies of conversations, they might use threats and blackmail to force a young person to take part in other sexual activity. They may also share the images and videos with others or circulate them online.

Gangs use sexual exploitation:

- to exert power and control
- for initiation
- to use sexual violence as a weapon.

Children or young people might be invited to parties or gatherings with others their own age or adults and given drugs and alcohol. They may be assaulted and sexually abused by one person or multiple perpetrators. The sexual assaults and abuse can be violent, humiliating and degrading.

## **Signs of CSE / CCE**

Sexual exploitation can be difficult to spot and sometimes mistaken for "normal" teenage behaviour. Knowing the signs can help protect children and help them when they've no one else to turn to.

- [Unhealthy or inappropriate sexual behaviour](#).
- Being frightened of some people, places or situations.
- Being secretive.
- Sharp changes in mood or character.

- Having money or things they can't or won't explain.
- Physical signs of abuse, like bruises or bleeding in their genital or anal area.
- [Alcohol or drug misuse](#).
- Sexually transmitted infections.
- Pregnancy.

#### **Other risk indicators may include:**

- Having an older boyfriend or girlfriend.
- Staying out late or overnight.
- Having a new group of friends.
- Missing from home or care, or stopping going to school or college; truanting, unexplained absences.
- Hanging out with older people, other vulnerable people or in antisocial groups.
- Involved in a [gang](#).
- Involved in criminal activities like selling drugs or shoplifting.

#### **Preventing CSE / CCE**

Teaching children and young people about healthy relationships and about staying safe online can help prevent CSE and CCE. It is important that the foundations of understanding about healthy relationships and consent are laid early in an age-appropriate way, and built on throughout childhood and young adulthood, consistently, by all those involved in a child's care.

It is important that children and young people know there are trusted adults they can speak to about their worries. At Marlborough College, the pastoral care system including house pastoral teams, Medical Centre, Chaplaincy and Counselling Service is well advertised to pupils. The sharing of concerns and issues is encouraged: our aim is to be a 'talking school'. All staff should be aware of, and alert to, CSE and CCE as forms of abuse, and should use the Child Protection and Safeguarding Policy to guide their responses and actions should they become aware of CSE or CCE, including informing the DSL.

As ever, staff are asked to call 999 *if a child is at immediate risk of harm*.

#### **County Lines**

**A link to the staff briefing on County Lines from Michalemas 2019 may be found here:**

<https://firefly.marlboroughcollege.org/safeguarding--for-all-staff/safeguarding-briefings-to-cr-and-support-staff>