



DOVER
COLLEGE

SAFEGUARDING AND CHILD PROTECTION **POLICY (INCLUDING EYFS)**

Version 13
Reviewed By: DSL
Reviewed: September 2020
Next Review: September 2021

CONTENTS

| Page | Content |
|------|---|
| 1 | Important Contacts |
| 2 | Important Contacts (contd.) |
| 2 | Appendices Contents |
| 3 | What to do if you have a concern flow diagram |
| 4 | Introduction and Ethos |
| 4 | Definition of Safeguarding |
| 5 | Context of the Policy |
| 5 | Governance and Safeguarding Team |
| 5 | Key Responsibilities |
| 6 | DSL Responsibilities |
| 6 | Member of Staff Responsibilities |
| 7 | Children and Young People Rights |
| 7 | Parents and Guardians Responsibilities |

| | |
|----|---|
| 7 | Recognising and Identification of Abuse and Neglect |
| 8 | Abuse and its different types |
| 9 | Abuse and its different types (contd.) |
| 9 | Safeguarding and Child Protection Procedures |
| 10 | Safeguarding and Child Protection Procedures (contd.) |
| 11 | Specific Safeguarding Issues (App VII) Reporting Staff and HM |
| 11 | Preventing Radicalisation and FGM |
| 12 | Peer-on-Peer Abuse |
| 12 | Up Skirting |
| 13 | Gangs, County Lines, Violent Crime and Exploitation |
| 13 | Child Sexual Exploitation |
| 13 | So-Called Honour Violence |
| 13 | Record Keeping |
| 14 | Reporting concerns on My Concern |

| | |
|----|--|
| 14 | Multi Agency Working |
| 14 | Confidentiality and Information sharing |
| 15 | Complaints |
| 15 | Staff Induction, Awareness and Training |
| 17 | Safer Recruitment |
| 17 | DBS Referral Line |
| 17 | Allegations against a member of staff and volunteers |
| 18 | Safeguarding Children with SEND |
| 19 | Online Safety |
| 19 | Curriculum and Staying Safe |
| 20 | College Access and Visitor Control |
| 21 | Pupils Missing Education CMFE |
| 21 | Early Years Foundation Stage EYFS |
| 21 | EYFS Supervision and support |

| | |
|----|--|
| 22 | EYFS Educational programmes and staying safe |
| 22 | EYFS Security |
| 23 | Whistle Blowing |
| 23 | Policy End |
| 24 | Appendix I Comprehensive Code of Practice for Protection of Children and Staff. |
| 33 | Appendix II Use of Mobile Phones and Digital Photography in EYFS |
| 34 | Appendix III Whistleblowing |
| 39 | Appendix IV PREVENT, FGM, And Sexual Exploitation Guidance |
| 45 | Appendix V Guidelines for visiting speakers. |
| 48 | Appendix VI Staff Code of Conduct |
| 59 | Appendix VII Current Safeguarding Priorities |
| 60 | Appendix VIII Allegations against members of staff and volunteers. |
| 65 | Appendix IX National Support |
| 67 | Appendix X Dover College Physical Restraint of Pupils |

| | |
|----|--|
| 71 | Appendix XI Provision for Pupils with particular religious, dietary, language or cultural needs |
| 72 | Appendix XII Coronavirus COVID-19 |
| 77 | Appendix XIII Safeguarding and Remote Learning |

Important Contacts

| | |
|---|--|
| Designated Safeguarding Lead (DSL) | Miss Julie Green T: 01304 244513 M: 07743 807491 E: greenj@dovercollege.org.uk |
| Deputy Designated Safeguarding Leads (DDSLs) | Mrs Tracey Mills T: 01304 244516 M: 07594 280793 E: millst@dovercollege.org Mr Jack Payne T: 01304 244552 M: 07802 621425 E: paynej@dovercollege.org.uk |
| Safeguarding Officers | Mr Lee Irwin irwinl@dovercollege.org.uk Ms Michelle Rolfe rolfem@dovercollege.org.uk Miss Emma Miller millere@dovercollege.org.uk |
| Headmaster | Mr Simon Fisher T: 01304 244501 M: 07793 444714 E: headmaster@dovercollege.org.uk |
| Safeguarding Governor | Mr Paul Tapsell M: 07947 016697 T: 01303 892082 |
| Dover College | Effingham Crescent Dover Kent CT17 9RH T: 01304 205969 |
| Designated Officer (LADO) | T: 03000 410 888 |
| Area Safeguarding | Mrs Claire Ledger T: 03000 415 648 M: 07917 602413 E: claire.ledger@theeducationpeople.org |
| Training and Development Manager | Mr Peter Lewer T: 03000 481 707 M: 07740 183807 E: peter.lewer@theeducationpeople.org |
| Education Safeguarding Advisor Online Protection | Ms Rebecca Avery T: 03000 415 797 M: 07789 968705 E: rebecca.avery@theeducationpeople.org |
| Kent Safeguarding Children's Services | T: 03000 411 111 |

| | |
|--|---|
| Central Duty Team (Integrated Front Door) | Out of Hours: 03000 419 191 social.services@kent.gov.uk |
| Early Help (Front Door) | T: 03000 411 111 T: 03000 422 998 doverearlyhelp@kent.gov.uk |
| Kent Police Child Abuse Investigation Unit (Local Police) | T: 01622 690690 |
| Channel DfE Helpline | T: 0207 3407 264 |
| NSPCC Whistleblowing Advice Line | T: 0800 0280 285 |

Appendices

1. Comprehensive Code of Safe Practice for Protection of Children and Staff
2. Use of Mobile Phones and Digital Photography Policy in EYFS
3. Whistleblowing Policy
4. Prevent, Female Genital Mutilation and Sexual Exploitation Guidance
5. Guidelines for Visiting Speakers
6. Staff Code of Conduct
7. Additional Issues – Current Safeguarding Priorities
8. Allegations Against Members of Staff
9. National Support
10. Physical Restraint of Pupils
11. Provision for Pupils with Particular Religious, Dietary, Language or Cultural Needs
12. Coronavirus COVID-19
13. Safeguarding and Remote Learning

What to do if you have a welfare concern at Dover College

Why are you concerned?

For example

- Allegation/child shares a concern or worry
 - Indicators of abuse or neglect

Immediately record your concerns using My Concern

- Reassure the child
- Clarify concerns if necessary (**TED: Tell, Explain, Describe**)
 - Use child's own words
 - Sign and date your records
- Seek support for yourself if required from DSL

Inform the Designated Safeguarding Lead (Julie Green 07743 807491)

Designated Safeguarding Lead

- Consider whether the child is at immediate risk of harm e.g. unsafe to go home
- Access the KSCB Support Level Guidance document and procedures: www.kscb.org.uk
 - Refer to other agencies as appropriate e.g. SCS, DO (LADO) or Police
- If unsure then consult with the Area Education Safeguarding Advisor (Claire Ledger 03000 415648) or Local Authority Social Worker at Central Referral Unit

If you are unhappy with the response

Staff

- Follow schools whistleblowing procedure

Pupils and Parents

- Follow school complaints procedures, available on the Dover College website

Record decision making and action taken on My Concern

Monitor

Be clear about

- What you are monitoring e.g. behaviour trends, appearance etc.
- How long you will monitor
- Where, how and to whom you will feedback and how you will record

Review and request further support (if necessary)

At all stages, the child's circumstances will be kept under review
The DSL will request further support if required to ensure the **child's safety is paramount**

Introduction and Ethos

- Dover College is a community and all those directly connected (staff, volunteers, governors, parents, families and pupils) have an essential role to play in making it safe and secure. Dover College recognises its statutory responsibility to safeguard and promote the welfare of all children.
- Dover College recognises the importance of providing an ethos and environment within school that will help children to be safe and feel safe. At Dover College, children are respected and encourage talking openly.
- Our College core safeguarding principles are:
 - It is our whole school responsibility to safeguard and promote the welfare of children.
 - All children (defined as those up to the age of 18) regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
 - All children have a right to be heard and to have their wishes and feelings taken into account.
 - All our staff understand safe professional practice and adhere to our safeguarding policies.

COVID-19

The policy remains in force throughout the response to Coronavirus (COVID-19)

Definition of Safeguarding

- Safeguarding and promoting the welfare of children is protecting children from maltreatment, preventing impairment of children's mental and physical health or development, ensuring that children grow up in circumstances consistent with the provisions of safe and effective care and taking action to enable all children to have the best outcomes (KCSIE 2020 Paragraph 4). Safeguarding is not just about protecting children from deliberate harm. It includes a wide range of issues relating to pupil's welfare, health and safety. 'Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play.' (KCSIE September 2020).
- All safeguarding policies will be reviewed on an annual basis by the Governing Body, which has responsibility for oversight of school safeguarding and child protection systems. The Designated Safeguarding Lead and Headmaster will ensure regular reporting on safeguarding activity and systems in school to the Designated Safeguarding Governor. The Designated Safeguarding Governor will not receive details of individual pupil situations or identifying features of families as part of their oversight responsibility.
- There are four main elements to our child protection policy
 - **Prevention** (e.g. positive, supportive, safe school culture, curriculum and pastoral opportunities for children, safer recruitment procedures);

- **Protection** (by following the agreed procedures, ensuring all staff are trained and supported to respond appropriately and sensitively to safeguarding concerns);
 - **Support** (for all pupils, parents and staff, and where appropriate specific intervention for those who may be at risk of harm);
 - **Working with parents and other agencies** (to ensure appropriate communications and actions are undertaken in a timely fashion).
- The procedures contained in this policy apply to all staff (including temporary staff and volunteers) and governors and are consistent with those of Kent Safeguarding Children Multi-agency Partnership (KSCMP) 2019.

Context

- This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes:
 - DfE guidance Keeping Children Safe in Education September 2020, 2019, 2018 (KCSIE) and 2016 (KCSIE)
 - Working Together to Safeguard Children 2018 (WTSC) and February (2019)
 - Framework for the Assessment of Children in Need and their Families (2000)
 - Kent and Medway Safeguarding Children Procedures (Online)
 - Early Years and Foundation Stage Framework 2017 (EYFS)
 - Prevent 2015
- Section 175 of the Education Act 2002 requires school governing bodies to make arrangements to safeguard and promote the welfare of all children who are pupils at a school, or who are students under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.

Governance and Safeguarding Team

Designated Safeguarding Lead (DSL) – Miss Julie Green (Senior Leadership Team)

Deputy Designated Safeguarding Leads (DDSL) – Mrs Tracey Mills (Deputy Head of Prep School) and Mr Jack Payne (Director of Sport/HSM)

Safeguarding Officers – Mr Lee Irwin, Ms Michelle Rolfe and Miss Emma Miller

Designated Safeguarding Governor – Mr Paul Tapsell

The Safeguarding Team receive regular updates and attend annual training from the local Authority, The Education People. The Headmaster has overall responsibility for all College procedures and policies.

Key Responsibilities

- The Governing Body and Senior Leadership Team and all staff have read and adhere to KCSIE 2020.
- The school has a nominated governor for safeguarding. The nominated governor, in conjunction with the DSL, will take the lead role in ensuring that the school has an effective policy which interlinks with other related policies; that locally agreed procedures are in place and being followed; and that the policies are reviewed at least annually and when required.
- The Governing Body, Headmaster and Senior Leadership Team will ensure that the DSL is properly supported in their role.

Designated Safeguarding Lead (DSL)

- The College Designated Safeguarding Lead (DSL) is a member of the Senior Leadership Team (Miss Julie Green). The DSL has the overall responsibility for the day-to-day oversight of safeguarding and child protection systems across the College.
- The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. The DSL and any deputy DSL's training will be updated annually. Deputy DSLs are trained to the same standard as the DSL. Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.

It is the role of the DSL to:

- Act as the central contact point for all staff to discuss any safeguarding concerns
- Maintain a confidential recording system for safeguarding and child protection concerns
- Coordinate safeguarding action for individual children
- Liaise with other agencies and professionals in line with WTSC 2018
- Know when to call the police following NPCC guidance
- Ensure that locally established referral procedures are followed as necessary
- Represent, or ensure the school is appropriately represented at multi-agency safeguarding meetings (including Child Protection conferences)
- Manage and monitor the school's role in any multi-agency plan for a child.
- Be available during term time for staff in the school to discuss any safeguarding concerns
- Ensure all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE (2020)
- To manage all online safety concerns

Members of Staff

All members of staff have a responsibility to:

- To provide a safe environment in which children can learn
- Be prepared to identify children who may benefit from early help
- To understand the early help process and their role in it
- To understand your schools safeguarding policies and systems
- To undertake regular and appropriate training which is regularly updated
- Be aware of the process of making referrals to children's social care and statutory assessment under the Children Act 1989
- Know what to do if a child tells them that he or she is being abused or neglected
- Know how to maintain an appropriate level of confidentiality
- Be aware of the indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection
- Be aware that safeguarding incidents and/or behaviours can be associated with factors outside the College and/or can occur between children outside this environment

Children and Young People

Children and young people (pupils) have a right to:

- Contribute to the development of school safeguarding policies
- Receive help from a trusted adult
- Learn how to keep themselves safe, including online

Parents and Guardians

Parents/carers have a responsibility to:

- Understand and adhere to the relevant school/policies and procedures
- Talk to their child about safeguarding issues & support the school in their safeguarding approach
- Identify behaviours which could indicate that their child is at risk of harm including online and seek help and support from the school, or other agencies

Parents can obtain a copy of the school Safeguarding & Child Protection Policy and other related policies on request and can view them via the school website (dovercollege.org.uk).

All staff must read and sign to confirm that they have read and understood Part 1 of Keeping Children Safe in Education (**KCSIE 2020**) including annex A.

The DSL and Deputy DSLs undergo annual external training to provide them with the knowledge and skills to carry out their role. Both the DSL and Deputy DSLs also receive regular updates to ensure they remain conversant with best practice and to keep up with developments relevant to their role. The safeguarding team also meet weekly to review safeguarding issues and this is reported weekly to the Designated Safeguarding Governor.

It is important to note that anyone can make a referral. Parental consent is not required for referrals to agencies.

Recognition and Identification of Abuse and Neglect

The staff have been made aware that child abuse and neglect encompasses a wide range of possible activities including physically inflicted injuries, but not exclusively, abuse of children is not always as obvious as a bruise or mark. Staff working with children are encouraged to maintain an attitude of **'it could happen here'** where safeguarding is concerned and work with a **high level of vigilance and professional curiosity**. Staff are always encouraged to act in the **best** interest of the child. The NSPCC website also provides useful additional information on types of abuse and what to look out for, as does our 'in-house' EduCare online package.

There is a list of indicators of which the staff is fully aware from training.

Abuse

All staff are made aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In many cases, multiple issues will overlap with one another.

Abuse is defined as a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult (women as well as men can be abusers) or adults, or another child, or children.

It is important to note that abuse can take place wholly online and technology may be used to facilitate offline abuse. All types of abuse can feature online and offline.

Types of abuse

(a) Physical

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.

(b) 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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Inattention given to the children in the areas of medical, educational, stimulation, environmental, nutritional, physical or emotional need. Obvious signs of physical neglect include underweight, dirty, hungry.

(c) Emotional

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.

(d) Sexual

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.

Safeguarding and Child Protection Procedures

Dover College adheres to the Kent Safeguarding Children Multi-agency Partnership (KSCMP) for all Safeguarding Children Procedures. The full KSCMP procedures and additional guidance relating to specific safeguarding issues can be found on the Kelsi website www.kelsi.org.uk

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to Children's Social Care (and if appropriate the Police) is made immediately.

- All members of staff are expected to be aware of and follow this approach:
- It may not always be appropriate to go through all four stages sequentially and if a child is in immediate danger or is at risk of harm, a request for support should be made immediately to Children's Social Work Services and/or the police via consultation with the DSL for the College.
- **The role of the school in situations where there are child protection concerns is NOT to investigate but to recognise and refer.**
- The DSL may seek advice or guidance from Area Education Safeguarding Advisor from the Education Safeguarding Team before making a decision regarding next steps. They may also seek advice or guidance from a social worker at the 'Front Door' service.
- All members of staff are made aware of the internal and local early help support services. Where a child is being offered or receiving early help support, staff will be supported to understand their role in any early help assessment or intervention. This includes identifying emerging problems, liaising with other professionals, and in some cases acting as the lead practitioner.
- The DSL will keep all early help cases under constant review and consideration will be given to a request for support to the 'Front Door' if the situation does not appear to be improving or is getting worse.
- All staff are aware of the process for making requests for support referrals for statutory assessments under the Children Act 1989, along with the role they might be expected to play in such assessments.
- **In all but the most exceptional circumstances, parents /Guardians will be made aware of the concerns for their child at the earliest possible stage.** In the event of a request for support to the Front Door being necessary, parents/Guardians will be informed and, consent for this will be sought in line with guidance provided by Kent Safeguarding Children Multi-agency Partnership (KSCMP), unless there is a valid reason not to do so, for example if to do so would put a child at risk of harm, or would undermine a criminal investigation.
- In the absence of the availability of the DSL to discuss an immediate and urgent concern, staff can seek advice from the Deputy DSLs. They may also seek advice from the Education Safeguarding Team or via consultation from a Local Authority social worker at the 'Front Door'. If anyone other than the DSL makes a referral to external services, then they will inform the DSL as soon as possible.

- On occasion, staff may pass information about a child to the DSL but remain anxious about action subsequently taken. Staff should feel able to check the progress of a case with the DSL so that they can reassure themselves the child is safe and their welfare is being considered. If following this process, the staff member remains concerned it is the responsibility of that staff member to follow the school's escalation process.
- If a child's situation does not appear to be improving, then the DSL will consider re-referral. Professional disagreements (escalation) will be responded to in line with the Kent Safeguarding Children Multi-agency Partnership (KSCMP) procedures and DSLs may request support via the Education Safeguarding Team.

Specific Safeguarding Issues (see appendix VII)

If staff members have concerns about **another member of staff** then this should be referred to the Headmaster **immediately**, who in turn will inform the Designated Officer (LADO).

If an **allegation is made against the Headmaster**, the person receiving the allegation should **immediately inform the Chair of Governors**, who will in turn inform the Designated Officer (LADO) and the Safeguarding Governor. The Headmaster will not be informed. The Designated Officer will advise if the police should be informed.

Expert and professional organisations are best placed to provide up to date guidance and practical support on specific safeguarding issues. The following websites and telephone numbers can be used for specific safeguarding information:

Kent Central Duty Team: 03000 411 111

Kent out of hours central duty team: 03000 419 191

Kent Early Help & Preventative Services: earlyhelp@kent.gov.uk 03000 419 222

www.nspcc.org.uk 0800 800 5000

Help and Advice Line 0808 800 5000

www.childline.org.uk 0800 1111

Preventing Radicalisation and Female Genital Mutilation (FGM)

We recognise it is a key role of the College to support children and provide stability in the lives of children who may be at risk of harm. We also recognise that our pupils can be vulnerable and exploited by others. Staff will be alert to the signs of vulnerability and/or susceptible to any extremist indoctrination.

Staff understand the need for a culture of vigilance to be present in the College to support safeguarding. This includes awareness and sensitivity to attitudinal changes of pupils, which may indicate they are at risk of radicalisation and may need help and protection.

However, staff are trained to be aware that there is no single way of identifying an individual who is likely to be susceptible to extremist ideology and family, friends and online influences can all play a major factor in the radicalisation of young people.

Staff should refer all concerns to the DSL immediately, who will then assess the level of risk and will contact the Channel Programme as part of the Prevent Duty (2015). (See **Appendix IV** for more detail)

Since October 2015, all teachers and health care professionals have a statutory duty to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. 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. (See **Appendix IV** for more detail).

Peer on Peer Abuse

The following should be read in conjunction with the **Anti-Bullying Policy**.

All members of staff at Dover College recognise that children are capable of abusing their peers. Peer on peer abuse can take many forms, including but not limited to, bullying, cyberbullying, gender-based abuse, hazing (initiation type violence), sexually harmful behaviour, violence and 'sexting'. Staff and the Senior Leadership Team are to be mindful that some potential issues may be affected by gender, age, ability and culture of those involved.

Dover College believes that abuse is abuse and it will never be tolerated.

'Up skirting' is a criminal offence and will not be tolerated. It typically involves someone taking a photograph under a person's clothes without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

'Sexting' (Youth Produced Sexual Images) will not be tolerated. The school will respond to cases of 'sexting' in line with UKCCIS "Sexting in Schools and Colleges" guidance and in line with Kent Safeguarding Children Multi-agency Partnership (KSCMP) guidance.

Peer on peer abuse occurs when a young person is exploited, bullied and / or harmed by their peers who are the same or similar age; everyone directly involved in peer on peer abuse is under the age of 18. 'Peer-on-peer' abuse can relate to various forms of abuse (not just sexual abuse and exploitation), and crucially it does not capture the fact that the behaviour in question is harmful to the child perpetrator as well as the victim. Other forms of abuse include: cyberbullying, sexual violence and harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling; sexting and initiating/hazing type violence and rituals.

Sexual violence and harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or harassing a single child or group of children. Children subjected to this will likely find the experience highly distressing. This is all likelihood will adversely affect their educational attainment.

Staff are made aware of the importance of:

- **Such behaviour is not acceptable, will never be tolerated and is not an inevitable part of growing up.**
- **Not dismissing sexual harassment or violence merely as 'Banter', 'part of growing up', 'just having a laugh', or 'boys being boys'.**
- **Challenge behaviours such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing such behaviours or tolerating them risks normalising them.**

Gangs, County Lines, Violent Crime and Exploitation

- Dover College recognises the impact of gangs, county lines, violent crime and exploitation. It is recognised that the initial response to child victims is important and that staff will take any allegation seriously and work in ways that support children and keep them safe.
- All staff have been trained and recognise the need to be vigilant for the signs that may include, but not exclusively:
 - Unexplained gifts/new possessions – these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs;
 - Increased absence from school
 - Change in friendships/relationships with others/groups
 - Significant decline in performance
 - Signs of self-harm/significant change in wellbeing
 - Signs of assault/unexplained injuries

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. This power imbalance can be due to age, gender, sexual identity, cognitive ability, physical strength, status and access to economic resources. The abuse might be (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The abuse can be committed by individuals, groups, males, females, children or adults, can commit the abuse: occurrences and levels of force can vary. The victim may have been exploited even if the activity appears consensual. CSE and CEE need not be physical. It can also occur through the use of online technology.

So – Called Honour Based Violence

This encompasses incidents or crimes, which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBA are abuse and should be handled and escalated as such. Staff who have a concern about this must refer this to the DSL immediately, who will inform the Kent safeguarding Children Multi-agency partnership (KSCMP), the Police and Children's Social Care.

Where FGM has taken place, this is a mandatory reporting incident to the Police.

Mental Health

Mental Health problems can be a sign that a child has suffered or is at risk of suffering abuse, neglect or exploitation. All staff should not try to diagnose these problems but should observe and identify those whole behaviours that suggest a problem. All staff should have an awareness of how Adverse Childhood Experiences (ACEs) can affect mental health, behaviour and education. All staff should follow this policy and speak with the DSL, or a Deputy DSL, about any mental health concerns that are also a safeguarding concern.

Record Keeping

- Staff will record any welfare concern that they have about a child on the schools' on-line safeguarding platform (My Concern), and immediately inform the DSL. Records must be completed by staff as soon as possible after the incident/disclosure, using the child's own words and will be signed and dated by the member of staff. All safeguarding concerns, discussions and decisions (and rationale for those decisions) will be recorded in writing. If members of staff are in any doubt about recording requirements, they should discuss their concerns with DSL.

Incident/Welfare concerns should be completed online via 'My Concern'.

- Safeguarding records are kept for individual children and are maintained separately from all other records relating to the child in the school. Safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL. Safeguarding records are shared with staff on a 'need to know' basis only.
- All safeguarding records will be transferred in accordance with data protection legislation to the child's subsequent school under confidential and separate cover. These will be given to the new DSL and a receipt of delivery will be obtained.

- Detailed guidance on Record Keeping is found in a separate document “Guidelines for Safeguarding Record Keeping in Schools”.
 -
- The Headmaster and Designated Safeguarding Governor will be kept informed of any significant issues by the DSL.

Multi-Agency Working

- Dover College recognises and is committed to its responsibility to work with other professionals, Kent Safeguarding Children Multi-agency Partnership (KSCMP) and other agencies in line with statutory guidance (WTSC 2018)
- Schools are not the investigating agency when there are child protection concerns. We will however contribute to the investigation and assessment processes as required. Dover College recognises the importance of multi-agency working and will support attendance at relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.
- The College Senior Leadership Team and DSL will work to establish strong and co-operative relationships with relevant professionals in other agencies.

Confidentiality and Information Sharing

- Dover College recognises that all matters relating to child protection are confidential. The Headmaster, or DSL will only disclose information about a pupil to other members of staff on a ‘need to know’ basis.
- All members of staff must be aware that whilst they have duties to keep any information confidential, they also have a professional responsibility to share information with other agencies to safeguard children.
- **All staff must be aware that they cannot promise a child to keep secrets which might compromise the child’s safety or wellbeing.**
- DfE Guidance on Information Sharing (July 2018 and 2nd September 2019) provides further detail. This information can be located on the Staff Safeguarding notice boards in both the Prep and Senior Staff Common Rooms.

Complaints

- The school has a **Complaints Procedure** available to parents, pupils and members of staff and visitors who wish to report concerns. This can be found on the College website
- All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff or volunteer will be dealt with under the specific Procedures for Managing Allegations against Staff policy. This can be found in the staff handbook.

Staff Induction, Awareness and Training

- All members of staff have been provided with a copy of Part 1 of “*Keeping Children Safe in Education*” (September 2020), which covers Safeguarding information for all staff. School leaders will read the entire document. School leaders and all members of staff who work directly with children will access Annex A: Keeping Children Safe in Education 2020. Members of staff have signed to confirm that they have read and understood Part 1 and Annex A.; and is recorded on the Single Central Register.
- The DSL will ensure that all new staff and volunteers (including temporary staff) are trained and aware of the school’s internal safeguarding processes.
- All staff members (including temporary staff) will receive training to ensure they are aware of a range of safeguarding issues.
- All staff members (including temporary staff) will receive regular safeguarding and child protection updates, at least annually, or as information is required.
- All staff members (including temporary staff) will be made aware of the College’s expectations regarding safe and professional practice via the staff behaviour policy (or code of conduct) and Acceptable Use Policy.
- The DSL and Headmaster will provide an annual report to the Governing Body detailing safeguarding training undertaken by all staff and will maintain up-to-date register of who has been trained.
- Although the school has a Designated Governor for Safeguarding (Mr Paul Tapsell), all members of the governing body will access appropriate safeguarding training which covers their specific strategic responsibilities on a regular basis.

Safe Working Practice

- All members of staff are required to work within clear guidelines on Safe Working Practice/ the Staff Code of Conduct.
- All staff should be particularly aware of the professional risks associated with the use of social media and electronic communication (email, mobile phones, texting, social network sites etc.) and should adhere to the school’s online safety and Acceptable Use policies.

Staff Supervision and Support

- Any member of staff affected by issues arising from concerns for children’s welfare or safety can seek support from the DSL.
- The induction process will include familiarisation with child protection responsibilities and procedures to be followed if members of staff have any concerns about a child’s safety or welfare.
- The school will provide appropriate supervision and support for all members of staff to ensure that:

- All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children
- All staff will be supported by the DSL in their safeguarding role
- All members of staff have regular reviews of their own practice to ensure they improve over time

The DSL will also put staff in touch with outside agencies for professional support if they so wish.

- The school will ensure that members of staff who are working within the foundation stage are provided with appropriate supervision in accordance with the statutory requirements of Early Years Foundation Stage (EYFS) 2017.

Safer Recruitment

Dover College is committed to reporting to the DBS within one month of an employee leaving the College (whether employed, contracted, or a pupil) whose services are no longer used because he or she is considered unsuitable to work with children. Dover College fulfils its legal duties to respond to and request from the DBS for information they already hold. Dover College will consider making a referral to the Teaching Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. The reasons such an order would be considered are “unacceptable professional conduct”, “conduct that may bring the profession into disrepute” or “a conviction, at any time, for a relevant offence”. Where a dismissal does not reach the threshold for DBS referral, separate consideration will be given to a TRA referral.

DBS referral helpline: 01325 953 795

- Dover College is committed to ensure that it develops a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our pupils and staff.
- The Governing Body and Senior Leadership Team are responsible for ensuring that the school follows safe recruitment processes outlined within guidance.

Dover College is responsible for ensuring that the school maintains an accurate Single Central Record (SCR) in line with statutory guidance.

- The Governing Body will ensure that there is at least one of the persons who conducts an interview has completed safer recruitment training
- We are also committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools.

- We advise all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands and warnings.

Allegations Against Members of Staff and Volunteers

- Dover College recognises that it is possible for staff (including supply staff and volunteers) to behave in a way that might cause harm to children and takes seriously any allegation received. Such allegations should be referred immediately to the Headmaster or Prep School Deputy Head in their absence who will first contact the Designated Officer (LADO) to agree further action to be taken in respect of the child and staff member. In the event of allegations of abuse being made against the Headmaster then staff are advised that allegations should be reported to the Chairman of Governors who will contact the Designated Officer (LADO) in the first instance.
- All staff, supply staff and volunteers should feel able to raise concerns about poor or unsafe practice and such concerns will always be taken seriously by the Senior Leadership Team.
- All members of staff are made aware of the school's Whistleblowing procedure and that it is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk. Staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 (8:00 AM to 20:00 PM Monday to Friday) or email: help@nspcc.org.uk
- Dover College has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff (including supply staff and volunteers) has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff (including supply staff and volunteers) at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the Designated Officer (LADO) and/or Schools Personnel Service.

When in Doubt – Consult

Safeguarding Children with Special Educational Needs

- Dover College acknowledges that children with Special Educational Needs (SEN) can face additional safeguarding challenges as they may have an impaired capacity to resist or avoid abuse.

- Dover College will ensure that children with SEN, specifically those with communication difficulties will be supported to ensure that their voice is heard and acted upon.
-
- **All members of staff are encouraged to be aware that children with SEN can be disproportionately impacted by safeguarding concerns such as bullying. All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour/mood change or injuries and not to assume that they are related to the child's disability and be aware that children with SEN may not always outwardly display indicators of abuse.**

Online Safety

- It is recognised by Dover College that the use of technology presents challenges and risks to children and adults both inside and outside of school (including when they are online at home).
- The DSL has overall responsibility for online safeguarding within the school.
- Dover College identifies that the issues can be broadly categorised into three areas of risk:
 - **content:** being exposed to illegal, inappropriate or harmful material
 - **contact:** being subjected to harmful online interaction with other users
 - **conduct:** personal online behaviour that increases the likelihood of, or causes, harm
- The DSL and Senior Leadership Team have read Annex C regarding Online Safety within 'Keeping Children Safe in Education' September 2020.
- Dover College recognises the specific risks that can be posed by mobile phones and cameras and in accordance with KCSIE September 2020 and EYFS 2017 has appropriate policies in place that are shared and understood by all members of the College community. Further information reading the specific approaches relating to this can be found in the schools **Online Safety Policy, IT Acceptable Use Policy** and **Social Media Policy**, which can be found in the Staff Handbook.
- Dover College will ensure that appropriate filtering and monitoring systems are in place when pupils and staff access school systems and internet provision.
- Dover College acknowledges that whilst filtering and monitoring is an important part of schools' online safety responsibilities, it is only one part of our approach to online safety. Pupils and adults may have access to systems external to the school control such as mobile phones and other internet enabled devices and technology and where concerns are identified appropriate action will be taken.
- Dover College will ensure a comprehensive whole school curriculum response is in place to enable all pupils to learn about and manage online risks effectively and will support parents and the wider school community (including all members of staff) to become aware and alert to the need to keep children safe online.

Curriculum and Staying Safe

- We recognise that schools play an essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour; what is 'safe'; to recognise when they and others close to them are not safe; and how to seek advice and support when they are concerned.
-
- Our curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that pupils have a range of contacts and strategies to ensure their own protection and that of others. Online safety is integrated into the curriculum.
- Our Relationships Education (RE) and Relationships and Sex Education (RSE) curriculum provides opportunities for increasing awareness about safeguarding including online safety.
- Our pastoral systems support children to talk to a range of staff. Children will be listened to and heard and their concerns will be taken seriously and acted upon as appropriate.
- The Early Years Foundation Stage curriculum teaches children the importance of good health including the promotion of good oral health and hygiene.

College Access and Visitor Control

1. There are many entrances to the College grounds. The main vehicle gate is electronic during the day and coded entry at night. All pedestrian gates are coded or swipe cards. The Prep School gate is coded and entry into the building is via a buzzer and intercom, controls are in the secretary's office.
2. The College is completely surrounded by fencing, bushes and walls, restricting entry.
3. Entrances are covered by CCTV and recorded.
4. Visitors are required to sign-in electronically at Priory Lodge and receive a visitor's badge, they are escorted at all times. On signing-in, their ID will be checked by the Headmaster's P.A. or College Receptionist and they will be shown the fire procedures. Visitors to the Prep School are asked to sign the visitors' book in the Prep School as well.
- 5. A central record of visiting speakers is kept within the Headmaster's Office.**
6. All requests for **visiting speakers** must be discussed with a member of SLT, who will request that: Wherever possible a biography of the speaker should be provided with the purpose clearly defined as to the information the speaker wishes to communicate. The information must align to the **values and ethos of the College and to Fundamental British values. Visiting Speakers will be supervised at all times by an employee of the College**
7. The speaker must be sent the "**Guidelines for Visiting Speakers**" document that is appended to this policy as **Appendix V**.

8. Deliveries are usually made before school, e.g. food deliveries. All other deliveries are monitored by the Support Staff Manager.
9. In the Prep School both at the commencement and at the end of the school day, staff release pupils to their parents from the appropriate door. A member of the Prep School staff escorts and delivers bus pupils to the appropriate bus. In the Senior School pupils make their own way to the buses and a member of staff is on duty until the last bus has left.
10. If a stranger is on site, staff should greet and escort them to Priory Lodge or from the Grounds. If members of staff have reservations about a visitor or stranger then the Headmaster or Deputy Head should be contacted.
11. Pupils should not allow access to strangers and are reminded not to do so.

Pupils Missing Education

All records about Child Protection and SEN issues are kept in secure, confidential files by the Designated Safeguarding Lead, Deputy Designated Safeguarding Lead and Head of Learning Support respectively. Records should be made by anyone dealing with a child when there are concerns about the welfare of that child, e.g. poor attendance.

A pupil going missing from education due to repeated or unexplained absence, or by leaving the College unexpectedly is a potential indicator of abuse or neglect, or where a family may be in need of additional support. It can also be an indicator of **Child Sexual Exploitation and Child Criminal Exploitation**.

Pupils who miss schooling in these circumstances, particularly on repeat occasions will be recorded on iSams and reported by Housemasters/mistresses to the DSL. A pupil who fails to attend school regularly or has been absent from school without the College's permission for a continuous period of 10 school days or more will be reported to the local authority.

Any concerns about appearance and dress, changed behaviour or unusual behaviour, health and emotional well-being of the child, deterioration in educational progress must be recorded and passed to the DSL. Likewise, any discussion with parents about the concern, the parents' response to you and the child and home conditions are also recorded and passed on to the Designated Safeguarding Lead, and Deputy Designated Safeguarding Leads if it is a Prep School matter. All records and subsequent reports should be factual, non-judgmental, clear, accurate and relevant.

Early Years Foundation Stage

'Every child deserves the best possible start in life and the support that enables them to fulfil their potential. Children develop quickly in the early years and a child's experiences between birth and age five have a major impact on their future life chances. A secure, safe and happy childhood is important in its own right.' (EYFS 2017 p5)

Supervision and Support (EYFS)

The setting will ensure that members of staff are provided with appropriate supervision in accordance with the statutory requirements of Early Years Foundation Stage 2017.

- In the Early Years all staff are given regular, planned and accountable supervision, which is a two-way process, offers support and develops the knowledge, skills and values of an individual, group or team. We see its purpose is to monitor the progress of professional practice and to help staff to improve the quality of the work they do, thus improving outcomes for children as well as achieving agreed objectives. Supervision also provides an opportunity to discuss sensitive issues including the safeguarding of children and any concerns raised about an individual or colleague's practice.
- All staff and volunteers will receive regular and planned supervision sessions. Uninterrupted time will be set aside to ensure any supervision sessions effective for both practitioner and management. During these supervisions, staff are given the opportunity to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands and warnings.
- Members of Staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email: help@nspcc.org.uk

Educational Programmes and Staying Safe (EYFS)

- We recognise that Early Years settings play an essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour; what is 'safe'; to recognise when they and others close to them are not safe; and how to seek advice and support when they are concerned.
- We will provide age appropriate educational programmes and opportunities to enable early year's children to develop self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that they have a range of contacts and strategies to
- Ensure their own protection and understand the importance of protecting others, including online.
- Systems have been established to support the empowerment of children to talk to a range of staff. Children will be listened to and their concerns will be taken seriously and acted upon as appropriate.

Security (EYFS)

- Appropriate checks will be undertaken in respect of visitors and volunteers coming into the setting. Visitors will be expected to sign in and out via the office visitors log and to display a visitor's badge whilst on site. Any individual who is not known or identifiable should be challenged for clarification and reassurance.
- The setting will not accept the behaviour of any individual (parent/carer or other) that threatens security or leads others (child or adult) to feel unsafe. Such behaviour

will be treated as a serious concern and may result in a decision to refuse access for that individual to the site.

- When registering for the Dover College nursery parents are asked to complete collection authorisation and password forms. Dover College believes that all those directly involved with our setting have an essential role to play in making it safe and secure. We aim to create the safest environment within which every child has the opportunity to achieve their full potential and we take seriously our responsibility to promote the welfare and safeguard all the children entrusted to our care.

Whistleblowing

If members of staff ever have any concerns about poor or unsafe practices or concerns about the behaviour or intentions of any person within the building, College grounds or within proximity of children, they have a professional duty to inform the management accordingly. This can be done in writing or verbally but staff should be prepared to discuss issues in the confidence that any such matter will be dealt with sensitively and with the necessary degree of confidentiality. There will be no disciplinary action taken against a member of staff for making such a report provided it is done in good faith.

The **Whistleblowing Policy** can be found in **Appendix (IV)**.

The College Address is:

Dover College
Effingham Crescent
Dover College
Kent
CT17 9RH

| | | |
|--------------------------------------|--|---|
| Designated Safeguarding Lead | Miss Julie Green | 07743 807491 greenj@dovercollege.org.uk |
| Deputy Designated Safeguarding Leads | Mrs Tracey Mills Mr Jack Payne | 01304 244516 millst@dovercollege.org.uk 01304 244552 paynej@dovercollege.org.uk |
| Safeguarding Team | Lee Irwin Michelle Rolfe Emma Miller | 01304 244539 irwinl@dovercollege.org.uk 01304 244540 rolfem@dovercollege.org.uk millere@dovercollege.org.uk |

Reviewed by Julie Green & Tracey Mills: September 2020

Policy Reviewed and Approved by SLT: September 2020

Approved by Chairman of Governors: 30th September 2020

Next Policy Review: September 2021

APPENDIX I

COMPREHENSIVE CODE OF SAFE PRACTICE FOR PROTECTION OF CHILDREN AND STAFF

1. Governance

Monitoring: DSL

Person Responsible: Miss Julie Green

Policy Review: September 2020

Next review: September 2021

2. Dover College's Code of Safe Practice for Protection of Children and Staff

A significant proportion of its content and, in some cases, the actual words used, have been taken from the document, 'Guidance for Safer Working Practice for adults who work with children and young people'.

The code should be seen as a supportive document, which aims to clarify good practice in order to keep both pupils and staff safe. This policy has been written to support staff and pupils by being as clear as possible about safe conduct concerning the professional relationship between staff and pupils. Inevitably, situations will arise that the policy does not cover, and staff should seek advice from members of the Senior Leadership Team.

3. Introduction

Dover College, as a small school, has always enjoyed a friendly working environment. It is important that we all work to retain this warm atmosphere but that we also ensure that we do not allow this atmosphere to be misinterpreted by staff and/or pupils.

4. The Aims of this Code are

- To provide staff (supply staff and volunteers) with clear advice on appropriate and safe behaviours for all adults working with children in the College.
- To keep children safe by clarifying which behaviours constitute safe practice and which should be avoided.
- To assist staff (supply staff and volunteers) to work safely and responsibly and to monitor their own standards and practice.
- To support the Senior Leadership Team and managers in setting clear expectations of behaviour and code of practice in the College.
- To support the Senior Leadership Team and Governors in giving a clear message that unlawful or unsafe behaviour is unacceptable and that disciplinary or legal action will be taken.
- Support safer recruitment.
- Minimise the risk of misplaced or malicious allegations against staff (supply staff and volunteers).
- Reduce the incidence of positions of trust being abused or misused.
- All staff have a duty to keep pupils safe and to protect them from physical and emotional harm. All staff must be aware of the College's **Safeguarding and Child Protection Policy and Procedures**.

5. Principles

- The welfare of pupils is paramount.
- All staff are responsible to safeguard and promote the welfare of pupils. This responsibility extends to a duty of care for those employed or contracted to work with pupils.
- All staff should work, and be seen to work, in an open and transparent way.
- The same professional standards should always be applied regardless of culture, disability, health, gender, language, racial origin, religious belief and/or sexual identity.

6. Duty of Care

- All staff have a duty to take care of themselves and be responsible for their own actions and behaviour.
- All staff are expected to take reasonable steps to ensure the safety and well-being of pupils. Failure to do so may be regarded as neglect.
- All staff should always report to a senior member of staff anything of concern about a pupil's safety or their own.
- If child abuse is suspected, all staff have a duty to pass information without delay to the Designated Safeguarding Lead.

7. Making a Professional Judgement

- Where no specific guidance exists, all staff are expected to secure the best interests and welfare of pupils and, in so doing, will be deemed to be acting reasonably.
- Such judgements should always be recorded and shared with the Senior Leadership Team, and in undertaking such actions staff will be seen to be acting responsibly.

8. Positions of Power and Trust

- A relationship between an adult and a pupil cannot be a relationship between equals.
- Do not use your position to gain access to information for your own advantage or to a pupil or family's detriment.
- Do not use your power to intimidate, bully, humiliate, threaten, coerce or undermine pupils.
- Do not engage in sexual activity with any pupil, of any age, or cause or invite a pupil to engage in or watch any kind of sexual activity.
- Be aware how your action may be viewed by others. Do not be seen to be paying special attention to a particular pupil. Always ask yourself, "Are my actions fair, reasonable, warranted, proportionate, measured, safe and applied equitably?"

9. Confidentiality

- Never pass on confidential information to anyone, including pupils, parents, press, police, social services, etc. without first seeking guidance from a member of SLT.
- All data covered by the Data Protection Act (basically everything personal or sensitive about a person, be it academic, home background, etc.) should be treated in accordance with the Act. If you are unsure of whether or not the data is covered, please see the Bursar.
- Children's needs in relation to Safeguarding have priority over data protection and requests for confidentiality, but consult the Senior Leadership Team in such circumstances.

10. Propriety and Behaviour

- Do not behave in such a manner that would lead any reasonable person to question your suitability to work with children or to act as a role model.
- Do not behave in a way, inside or outside of school, that indicates you may not be suitable to work with children. The reason is because of transferable risk.

- All staff should ensure that their relationship with pupils clearly takes place within the boundaries of a respectful professional relationship.
- Do not make sexual remarks to a pupil (including email, text messages, phone and letter), or behave in any way which could be interpreted as sexually suggestive or provocative.
- Do not discuss your own sexual preferences or sexual relationships with or in the presence of pupils.
- Do not discuss a pupil's individual sexual relationships with anyone except a HSMs or College nurse, in class or in other inappropriate contexts or settings.
- Do not allow public discussion or criticism of colleagues by pupils.
- Do not make unprofessional personal comments, which demean, humiliate or make a scapegoat of pupils.

11. Infatuations

Record and report immediately to the Safeguarding Lead or Deputies any indications (verbal, written or physical) that suggest a pupil may have developed an infatuation with you, or with a colleague.

12. Dress and Appearance

Staff should dress appropriately for the tasks and the work they undertake.

13. Anti-corruption and Bribery (including gifts and donations).

- All gifts must be reported to the Bursar via email and include the gift, the approximate value of the gift and the benefactor. Gifts of over £25 cannot be accepted without prior approval from the Bursar. The gift register will be monitored for audit purposes and the Bursar will undertake investigations where necessary.
- Staff should exercise care when selecting pupils for specific activities or privileges to avoid perceptions of favouritism or unfairness. Methods and criteria for selection should always be transparent and subject to scrutiny.
- Generally, only give gifts to a pupil as part of our agreed reward systems. In any other context, ensure that any gifts given are of insignificant value and given to all children equally.
- For more information, please see the **Anti-Corruption and Bribery Policy** in Part 2 of the Staff Handbook.

14. Use of Personal Living Space

- Staff should be vigilant in maintaining their privacy and mindful of the need to avoid placing themselves in vulnerable situations and the need to maintain professional boundaries.
- However, it is recognised that a member of staff may have their own children in the College and they may wish to have their child's friends to visit and stay. This would be recognised as a private social arrangement which would not violate this advice.
- Pupils including boarders should meet with staff in public designated areas.
- Staff are strongly advised to be accompanied by a colleague if circumstances dictate a need to see a pupil in staff accommodation.

15. Contact and Communication with pupils

- Do not try to establish secret social contact with pupils, or their parents for friendships or a relationship. **Staff are prohibited to have any form of social media contact with current pupils.**
- Where social contact is an integral part of work duties, such as pastoral work, care should be taken to maintain appropriate personal and professional boundaries.
- This also applies to social contacts made through interests outside of the working environment.
- Staff should always approve any planned social contact with children with a member of SLT. Staff should also advise Designated Safeguarding Lead of any social contact which may give rise to concern.
- Please use the College emails, phones or mobile phones whenever possible.
- Staff are expected to abide by the College's **IT Acceptable Usage Policy** and the advice given with respect to social networks.
- Any contact with parents or pupils by email must be by College email and copied in to the Headmaster's PA at headmaster@dovercollege.org.uk.
- Staff should only make contact with pupils for professional reasons.
- Staff should recognise that text messaging is rarely an appropriate response to a pupil in a crisis and should only be used as a last resort in these circumstances.
- Any inappropriate communication with pupils by staff, which is outside the agreed protocols, may lead to disciplinary and/or criminal investigations.
- Any unwelcome communications to staff, be they written or visual, from pupils or parents should be reported immediately to the Senior School Deputy Head, Prep School Deputy Head, Bursar and/or the Headmaster.
- Staff should address pupils by their first names and pupils should use appropriate title and surname when talking to staff.

16. Physical contact

- There are occasions and aspects of people's professional responsibilities, e.g. College Nurse, when it is appropriate and proper for staff to have physical contact with pupils; however, it is crucial that you should only touch pupils in ways, which are appropriate and proper to your professional role and responsibilities. As a general rule, do not touch pupils. This is especially important if you are on your own with them.
- Physical contact should never be secretive or for personal gratification.
- Physical contact should never be of a type, which may be considered indecent.
- Physical contact should be in response to a child's needs at the time, of limited duration, and appropriate given their age, stage of development, gender, ethnicity and background.
- Some staff (e.g. P.E., Music and Learning Support Staff) may need to initiate physical contact, e.g. in order to support a child so they can perform a task safely, to demonstrate a particular piece of equipment/ instrument or assist them with an exercise. This should be done with the pupil's understanding of the reason and their consent, and in an 'open' environment.
- Do not indulge in horseplay, tickling or fun fights.
- Use extra caution when it is known that a pupil has suffered previous abuse or neglect.
- Report immediately to the Designated Safeguarding Lead or Deputy Designated Safeguarding Leads any physical contact which concerns you or which you believe may have been misconstrued.

17. Pupils in Distress

- There may be rare occasions when a distressed pupil needs comfort and reassurance, and this may involve physical contact, principally with our youngest pupils.
- All staff should use their professional judgement to comfort or reassure a pupil in an age-appropriate way, which might include physical contact, whilst maintaining professional boundaries.
- All staff should be self-aware, avoid any contact, which may be intrusive or open to misinterpretation, and be circumspect in offering reassurance in one to one situations.
- All staff should record and report to their Line Manager if they have offered comfort to a distressed pupil.

18. Control and Restrictive Physical Intervention

- All staff should always adhere to the Restrictive Physical Intervention for Pupils, which is located in Part 2 of the Staff Handbook and Appendix X of the **Safeguarding & Child Protection Policy**.
- Always try to defuse situations without physical intervention.
- We do not expect staff to put themselves at physical risk, but you may use physical intervention to prevent a pupil from injuring themselves or others or to prevent damage to property.
- When physical intervention is used it should be proportionate and at the minimum level needed to prevent harm.
- If possible, enlist the help of another staff member.
- If physical intervention has been used, the incident and subsequent actions should be documented and reported to the Safeguarding Lead.

19. Showers and Changing

- Pupils are of course entitled to privacy, but there are occasions where there will be a need for an appropriate level of supervision in order to safeguard pupils.
- All staff should announce their intention of entering the changing rooms.
- Avoid visually intrusive behaviour.
- Do not touch a pupil in a state of undress.
- Do not remain there unless the pupil needs it.
- Do not change or shower in the same place.

20. Behaviour Management

- All pupils have a right to be treated with respect and dignity even when they display difficult or challenging behaviour.
- All staff should adhere to the **'behaviour management'** as set out in the **Code of Conduct of the Staff Handbook**.
- All staff should not use any form of degrading treatment to punish a child.
- Always try to remain calm and to defuse situations before they escalate.
- Apply the system of rewards and sanctions fairly and consistently so as to minimise the risk of pupils perceiving injustice or victimisation.
- If an incident occurs which warrants reporting, make contemporaneous notes on anything that happened and what was said and inform the Housemaster's and Housemistresses (HSMs) and Tutor of the pupil. In serious incidents inform the Safeguarding Lead in writing as soon as possible after the event and sign and date the statement.

21. One-to-One Situations

- Where staff work on a one-to-one situation with pupils on a regular basis, such as music lessons and Learning Support, staff should follow the agreed policy within their departments, which should reflect the following guidelines.
- Avoid meeting in remote, secluded areas of the College.
- Ensure there is visual access and/or an open door wherever possible.
- Try to ensure that there are other staff around or at least aware of the meeting.
- Do not use 'engaged' or equivalent signs.
- If you have reason to be concerned about a one-to-one meeting in advance, because of a pupil's or parents' previous behaviour, arrange for a colleague to be present, especially where there is a gender difference. Always make notes during or soon after the meeting.
- Do not pre-arrange meetings with pupils away from the College premises.
- Avoid travelling in a school or personal vehicle with only one child and seek permission from a member of the Senior Leadership Team beforehand.

22. Overnight Supervision During Exam

- This should never be undertaken without prior arrangement with the exam board, Examination Officer and with a member of the Senior Leadership Team.
- Wherever possible the College will use the boarding house accommodation for overnight supervision.

23. Transport and Pupils

- Under normal circumstances, staff should not transport pupils in their own vehicle, especially one-to-one, without the consent of the pupil and, except in emergency situations, the consent of a parent and a member of SLT.
- Staff must always have valid business insurance for this purpose. (The College provides this but if in doubt check with the Bursar).
- Non-Boarding Staff should not transport a pupil to hospital in their own vehicle following an accident without specific medical approval from the College. Otherwise, always call an ambulance.
- Staff are advised never to accept a lift from a pupil.

24. Educational Visits and After-School Activities

- Staff must observe all aspects of the College policy on educational visits.
- Always have another adult present in out of school activities away from the College site unless otherwise agreed by a member of the Senior Leadership Team.

- Ensure there is the appropriate HSMs/guardian/parental consent to the activity. (See arrangement of trips)
- Remember that in these less formal contexts you are still in a legal position of trust and need to ensure that your behaviour is professional at all times and cannot be interpreted as seeking to establish an inappropriate relationship or friendship.

25. First Aid and Administration of Medicines

- Staff should be fully aware of the **First Aid Policy** within the **Health and Safety Policy** located on the Dover College website and what medicine they can and cannot administer to pupils.
- There is some basic information regarding first aid within Part 1 of the Staff Handbook.
- In some situations, such as boarding houses and trips, staff will be allowed to administer or to supervise the taking of medicines and will have been authorised to do so by the Medical Centre.
- Pupils needing medication regularly should have a health care plan drawn up by the College Sister and staff responsible for this pupil should be made aware of this plan.
- Wherever possible, first aid should only be given by trained volunteer staff and by staff of the same gender if possible. Try to ensure that another adult is present, or at least aware, when first aid is administered. In exceptional emergency circumstances, it may be necessary for an untrained member of staff to intervene. If so, do the minimum required whilst awaiting specialist support.
- Always report any accident or first aid administration to the College Medical Centre with contemporaneous notes, which are signed and dated, as parents must be informed.
- A member of staff should always accompany a child taken to hospital by ambulance, and should stay until the parent arrives.

26. Curriculum

Care should be taken that resource materials are appropriate and relate to the planned learning objectives. Sensitive issues (e.g. relating to sex, race, religion, gender, disability, FGM, terrorism, radicalisation) should be handled with care, especially where unplanned discussion arises. Seek advice from your Head of Department beforehand if unsure.

In the case of concerns of:

1. **Radicalisation**-challenge giving a balanced view. Report your concern to the Designated Safeguarding Lead who will refer to the Prevent guidance and seek advice to determine if a referral needs to be processed into the Channel process.
2. **FGM**-refer your concerns to the Designated Safeguarding Lead.

- Do not enter into or encourage inappropriate or offensive discussion about sexual activity.
- Remember that parents have a legal right to withdraw children from all or any part of sex and relationship education (but not from the biological aspects of human growth and reproduction integral to the science curriculum).
- Do not show visual material, which is inappropriate for the age of the pupils concerned, taking special care over the use of videos and DVDs, both in the classroom and in the boarding houses.

27. Photographic and Video Images

For more information, please see the **Mobile Phones & Digital Photography Policy** in Appendix (III) of this policy. It is recognised that taking or recording of images of pupils is very good practice at times, or to allow pupils to record such images of each other, e.g. to assist teaching and learning, to celebrate achievement and for publicity. However, any such work should take place with due regard to the law and the need to safeguard the privacy, dignity, safety and well-being of pupils.

Because of the potential for images of children to be misused for pornographic or grooming purposes, staff should follow this code:

- Only record images when there is a justifiable need.
- Be clear to pupils about why the images are being recorded and what will happen to them.
- Ensure that your Line Manager is aware that you are recording images.
- Ensure that all images recorded are available for scrutiny, in order to screen for acceptability.
- Avoid making images in one-to-one situations.
- Do not take images 'in secret', or take images in situations that may be construed as being secretive.
- Images of pupils should not be displayed on websites, social media, in publications or in a public place (away from the College site) without the consent of the pupil and parent. Check with the Headmaster if you have any doubts in this area. Existing parents are consulted to allow them to indicate that they do not wish their child to be photographed. Unless they so indicate, we will deem that it is acceptable to record images for legitimate purposes. Parents of new intakes/new admissions will routinely be asked to give such general consent.
- If a photo is published, ideally you should not name the pupil, unless you have direct parental consent. Similarly, if a pupil is named, you should not use the photo, unless you have direct parental consent.
- Where the College has decided that images should be retained for further use, they should be securely and centrally stored and used only by those authorised to do so.
- Photos or videos of College events/activities taken by parents or others should be taken in full view of all participating and the audience.

28. Internet Use

- All staff must follow the College's **IT Acceptable Usage Policy** and will be expected to sign that they accept the policy, which may be found in Part 2 of the Staff Handbook.
- All staff should be mindful of the legal position relating to child pornography.
- All staff must not use College IT equipment to access adult pornography, on or off site. Neither should personal equipment containing images or links to them be brought into the College.
- The College's Internet access is filtered but staff have an obligation to help ensure that pupils are not exposed to any inappropriate images or web links. When indecent images of children or other unsuitable material are found the Safeguarding Lead must be informed immediately, who in turn will inform the Headmaster, Police and the Local Authority Designated Officer. The IT Manager should also be informed to ensure that any sites are blocked as quickly as possible.

29. Responsibilities

All staff should be aware of the **Safeguarding & Child Protection Policy** as published on the Dover College website.

All staff should report to the College's Designated Safeguarding Lead any behaviour by colleagues (including support staff and volunteers) which gives cause for concern in relation to safeguarding the wellbeing of pupils. This should include incidents outside school, which did not involve children but could impact their suitability to work with children. The Designated Safeguarding Lead will consult the Headmaster.

If any incident occurs which may result in an action being misinterpreted and/or an allegation being made against a member of staff, then the relevant information should be recorded promptly and reported to the Headmaster. Staff should always feel able to talk with their Line Manager any difficulties or problems that may affect their relationship with pupils so that appropriate support can be provided or action can be taken. All staff who are the subject of allegations, may find themselves suspended which is deemed as a neutral act and are advised to contact their professional association.

APPENDIX II

USE OF MOBILE PHONES AND DIGITAL PHOTOGRAPHY POLICY IN EYFS

1. Policy Statement

Children have their photographs taken to provide evidence of their achievements for developmental records (The Early Years Foundation Stage, EYFS 2012) and for marketing. All staff, visitors, volunteers and pupils are not permitted to use their own mobile phones to take or record any images of pre-school children for their own records during session times.

2. Procedures

Under the Data Protection Act 1998, the pre-school must seek parental consent to take photographs and use video recorders. Photographs will be stored on the pre-school laptops and computers, which is password protected, until the pre-college ceases to operate, should this occur then all photographs will be shredded or deleted from the pre-school laptops and computers.

The pre-school's digital camera/s or memory cards must not leave the pre-school setting, except for EYFS outings. Photos are printed in the setting by staff and images are then removed from the camera's memory.

Photographs may be taken during indoor and outdoor play and may be displayed and used in a child's 'Learning Journey', as part of the child's developmental records for children and parent/carers to share and make contributions. The 'Learning Journey' becomes the property of the Parent/carer at the end of the child's time in the setting.

Often photographs may contain other children in the background.

Events such as, sports day, outings, Christmas and fundraising events may be recorded by video and photographs by staff and parent/carers but always in full view of all attending.

On occasion, we might like to use photographs of the children taking part in an activity to advertise/promote our Early Learners via the Dover College Website; parental permission is sought through Admissions on entry to Dover College.

- Personal mobile phones belonging to the EYFS staff are not to be used throughout contact time with the children and are locked away.
- EYFS Staff are not permitted to use recording equipment on their personal mobile phones to take photos or videos of EYFS children.
- During outings nominated staff will be permitted to have access to their own mobile phones, which are to be used for emergency contact only.
- All cameras and mobile phones are prohibited in the toilet and nappy changing area.

APPENDIX III

WHISTLEBLOWING

1. Scope

This procedure is separate from the College's procedures regarding grievances. Individuals should not use the whistleblowing procedure to raise grievances about their personal employment situation. There are also existing procedures in place (The Complaints Procedure) to enable pupils, staff, parents and stakeholders to make complaints and raise concerns about individual and particular matters.

The whistleblowing procedure is intended to cover concerns that fall outside the scope of individual complaints and concerns. It provides members of staff with a route to raise concerns internally and in a confidential fashion about malpractice. Concerns can be raised with:

| | | |
|--|---|---|
| Designated Safeguarding Lead | Miss Julie Green | 07743 807491 greenj@dovercollege.org.uk |
| Deputy Designated Safeguarding Leads | Mrs Tracey Mills Mr Jack Payne | 01304 244516 millst@dovercollege.org.uk 01304 244552 paynej@dovercollege.org.uk |
| Safeguarding Officers | Mr Lee Irwin Ms Michelle Rolfe Miss Emma Miller | 01304 244539 irwinl@dovercollege.org.uk 01304 244540 rolfem@dovercollege.org.uk millere@dovercollege.org.uk |
| Headmaster | Mr Simon Fisher | 01304 244501 headmaster@dovercollege.org.uk |
| Safeguarding Governor | Mr Paul Tapsell | 07947 016697 / 01303 892082 |
| Kent Specialist Children's Services: Central Duty Team | | 03000 411 111 Out of Hours: 03000 419 191 social.services@kent.gov.uk |
| NSPCC Whistleblowing Advice Line | | 0800 0280 285 |

Malpractice is not easily defined and it includes but is not restricted to;

- fraud, financial irregularities
- bribery
- dishonesty
- malpractice
- ignoring serious risks to health, safety or the environment
- criminal offences or activities
- miscarriages of justice
- failure to comply with legal obligations
- inappropriate behaviour
- unethical conduct
- any behaviour which is at odds with the policies of Dover College or seems likely to harm somebody or the environment
- any behaviour which represents a cover-up of these sorts of issues

The policy also provides if necessary, for such concerns to be raised outside the organisation.

2. Principles

In accordance with Lord Nolan's Second Report of the Committee on Standards in Public Life, the College's policy on whistleblowing is intended to demonstrate that the College :-

- Will not tolerate malpractice;
- Respects the confidentiality of staff raising concerns and will provide procedures to maintain confidentiality so far as is consistent with progressing the issues effectively;
- Will provide the opportunity to raise concerns outside of the normal line management structure where this is appropriate;
- Will invoke the College's **Disciplinary Policy** and procedure in the case of false, malicious, vexatious or frivolous allegations;
- Will provide a clear and simple procedure for raising concerns, which is accessible to all members of staff.

3. Safeguards

3.1 Protection from reprisal, harassment or victimisation

Dover College recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisals from those responsible or close to the alleged malpractice. No member of staff will suffer a detriment or be disciplined for raising

a genuine and legitimate concern, providing that they do so in good faith and following the Whistleblowing procedures.

3.2 Confidentiality

Dover College will protect the identity of individuals who raise concerns and do not want their name to be disclosed to the alleged perpetrator of malpractice without their prior approval. It must be appreciated, however, that the investigation may reveal the source of the information, and statements made by the individuals who raised the issue may be required as part of the evidence. The College encourages individuals to put their name to allegations made. Concerns expressed anonymously are much less powerful, but they will be considered at the discretion of the College. In exercising this discretion, the factors to be taken account of will include:

- the seriousness of the issue raised;
- the credibility of the concern;
- the likelihood of confirming the allegation from attributable sources

3.3 Untrue allegations

If an allegation is made in good faith, but is not confirmed by the investigation, no action will be taken against the individual. However, if individuals make allegations that are malicious or vexatious, disciplinary action is likely.

4. How to Raise A Concern

The sooner individuals express their concern the easier it is to take action.

As a first step;

- A pupil should normally raise concerns with their HSMs or with the Deputy Head; in a certain situation it could be raised with the Headmaster. This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. Pupils who feel that they cannot approach management in the College should approach the College's Independent Listener.
- An employee should normally raise concerns with the Senior School Deputy Head, the Prep School Deputy Head or the Bursar as appropriate; in some situations, it could be raised with the Headmaster. This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. Employees who feel that they cannot approach management in the College should approach either the Chairman of Council of Governors or another member of Council.

- Concerns are better raised in writing and should set out the background and history of the concern, giving names, dates and places where possible, and the reason why the employee is concerned about the situation.
- An individual who does not feel able to put their concerns in writing can telephone or meet the appropriate person.
- Individuals may invite a friend (trade union official or association representative, if relevant) to raise the matter in conjunction with them.

5. How will the College respond?

Any concern raised will be investigated thoroughly and in a timely manner, and appropriate corrective action will be pursued. The person raising the concern will be kept informed of progress and whenever possible (subject to third party rights and legal or contractual restraints), will be informed of the resolution.

Within two weeks of a concern being received, the Headmaster or appropriate member of College staff will write to the individual who raised the issue:

- acknowledging that the concern has been raised
- indicating how it is proposed that the matter be dealt with
- where possible, giving an estimate of how long it will take to provide a final response
- telling the individual whether further investigations will take place and if not, why not

The action taken by the College will depend on the nature of the concern. The matters raised may for example:

- be resolved by agreed action without the need for investigation.
- be investigated internally;
- be referred to external agencies.

The amount of contact between the investigators considering the issue and the individual who has raised the issue will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought from the individual.

When any meeting is arranged with the individual, they will be given the right to be accompanied by a friend or fellow worker who is not involved in the incident to which the concern relates.

A member of staff who is not satisfied that their concern is being properly dealt with will have a right to raise it in confidence with the Council of Governors.

6. External Procedures

It is hoped that there will be a satisfactory outcome to any investigations or action taken. Where all internal procedures have been exhausted or where an individual is not satisfied, a person shall have a right of access to an external person/body.

6.1 Taking the issue further - pupils:

- The College's Independent Listener – Minister Deb Scoble
- The College Council of Governors

6.2 Taking the issue further – employees

- relevant professional bodies or regulatory organisations (this may include (depending on the subject matter of the disclosure), the Audit Commission, the Health and Safety Executive and/or the Local Authority Designated Officer (where the disclosure relates to a child protection issue), the Information Commissioner's Office)
- Dover College Council of Governors
- the Police
- the charity: Public Concern at Work (telephone 020 7404 6609)

6.3 To be considered if taking the matter outside of Dover College

- The person must make sure that they do not disclose otherwise confidential information.
- Staff must in no circumstances take matters directly to the press in any form, and this action will be seen as a serious disciplinary matter.

7. Going directly outside of Dover College

It should be noted that under the Public Interest Disclosure Act 1998, there are circumstances where a member of staff may be entitled to raise a concern directly with an external body where the individual reasonably believes:

- That exceptionally serious circumstances justify it;
- That the College would conceal or destroy the relevant evidence;
- Where they believe they would be victimised by the College;
- Where the Secretary of State has ordered it.

8. Implementation

The Council of Governors and the SLT has overall responsibility for the maintenance

and operation of this policy. The DHP will maintain a record of concerns raised and the outcomes and will report as necessary to the Governing Body.

APPENDIX IV

PREVENT, FEMALE GENITAL MUTILATION and SEXUAL EXPLOITATION GUIDANCE

Safeguarding Pupils Vulnerable to Extremism and Radicalisation

Dover College recognises that safeguarding against extremism and radicalisation is no different from safeguarding against any other vulnerability. At Dover College all staff are expected to uphold and promote the fundamental principles of British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs within our diverse community. This is achieved through the house structures, assemblies, chapel services and our PSHE programme.

There is no place for extremist views of any kind at Dover College, whether political, religious, sexist or racist. Therefore, we provide a broad and balanced curriculum, delivered by skilled teachers, so that our pupils are enriched, understand and become tolerant of difference and diversity and also to ensure that they thrive, feel valued and are not marginalised.

The College is clear that extremism and radicalisation should be viewed as a safeguarding concern. The Headmaster and the Designated Safeguarding Lead (DSL) will assess the level of risk within the College community and put actions in place to reduce that risk, if the need arises, through the Educational Institution Prevent Assessment.

When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL or Deputy DSL immediately. All schools and colleges must work closely with social care, the police, health services and other services to promote the welfare of children and protect them from harm. Radicalisation is a specific safeguarding issue and must be treated as such. Radicalisation is addressed within the Government Prevent Strategy and it carries three main objectives:

- Respond to the **ideological challenge** of terrorism and the threat we face from those who promote it
- **Prevent pupils from being drawn into terrorism** and ensure that they are given appropriate advice and support
- Works with a wide range of sectors where there are risks of radicalisation that we need to deal with.

The Prevent Strategy:

At the heart of Prevent is safeguarding children and adults and providing early intervention to protect and divert people away from being drawn into terrorist activity. Prevent uses a range of measures to challenge extremism including:

- Supporting people who are at risk of being drawn into terrorism or extremist activity through the channel process
- Work with community groups and social enterprise projects who provide services and support to vulnerable people
- Working with faith groups to assist them in providing support and guidance to people who may be vulnerable
- Support to schools through engagement, advice and training

Channel provides support across the country to those who may be vulnerable to being drawn into terrorism. The overall aim is to offer early intervention and diverting people away from the risk they may face.

The Channel DfE helpline: 0207 340 7264

Indicators of Vulnerability to Radicalisation

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
2. Extremism is defined by the Government in the **Prevent Strategy** as:
 - a. 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.
3. Extremism is defined by the Crown Prosecution Service as:
 - a. The demonstration of unacceptable behaviour by using any means or medium to express views which:
 - i. Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
 - ii. Seek to provoke others to terrorist acts;
 - iii. Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
 - iv. Foster hatred, which might lead to inter-community violence in the UK.
4. There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.
5. Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.
6. Indicators of vulnerability include:
 - a. Identity Crisis – the pupil is distanced from their cultural/religious heritage and experiences discomfort about their place in society;

- b. Personal Crisis – the pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different groups of friends; they may be searching for answers to questions about identity, faith and belonging;
 - c. Personal Circumstances – migration; local community tensions; and events affecting the pupil’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
 - d. Unmet Aspirations – the pupil may have perceptions of injustice; a feeling of failure; rejection of civic life;
 - e. Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration;
 - f. Special Educational Need – pupils may experience difficulties with social interaction, empathy towards others, understanding the consequences of their actions and awareness of the motivations of others.
7. However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.
8. More critical risk factors may include:
- a. Being in contact with extremist recruiters;
 - b. Accessing violent extremist websites, especially those with a social networking element;
 - c. Possessing or accessing violent extremist literature;
 - d. Using extremist narratives and a global ideology to explain personal disadvantage;
 - e. Justifying the use of violence to solve societal issues;
 - f. Joining or seeking to join extremist organisations; and Significant changes to appearance and/or behaviour;
 - g. Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis.

How to Refer a Concern

All staff can play a vital role in helping to ensure that children are safe from risk of harm. Concerns for a pupil may come to the attention of a teacher or member of the community in a number of ways. Some concerns are overt but others may seem more covert. Observation of behaviour or change of attitude, demeanour or behaviour may be subtler than obvious signs of injury or disclosure.

Anyone who has a concern about the welfare or safety for a pupil, however insignificant this may appear to be, should seek advice from the DSL or Deputy Safeguarding Leads immediately. Any incident or noticeable behavioural change in a child or young person that

gives cause for concern should be handed directly to either the DSL or Deputies as soon as possible. It is important that any records taken are factual and reflect the words used by the pupil.

Opinion or supposition should not be recorded. All records must be signed and dated by the member of staff with timings if appropriate. It is important to remember that any issues are confidential and that staff should be informed on a need to know basis only.

Serious Concerns must be reported immediately to the DSL or Deputy Safeguarding Leads..

Safeguarding Pupils who are Vulnerable to Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), Forced Marriage, Female Genital Mutilation (FGM), or Trafficking

The College keeps itself up-to-date on the latest advice and guidance provided to assist in addressing specific vulnerabilities and forms of exploitation. Through the College's values, ethos and behaviour policies our safeguarding policy provides the basic platform to ensure our pupils are given the support to respect themselves and others, stand up for themselves and protect each other. Our staff are supported to recognise warning signs and symptoms in relation to specific issues. Child sexual exploitation (CSE) and Child Criminal Exploitation (CCE) can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Female Genital Mutilation (FGM):

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003. **It is a form of child abuse and violence against women.** FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons. Section 5B of the 2003 Act 1 introduces a **mandatory reporting duty** which requires teachers in England and Wales to report 'known' cases of FGM in under 18s which they identify in the course of their professional work to the police. **The duty applies from 31 October 2015 onwards to contact the local Police 01622 690690**

'Known' cases are those where either a girl informs the person that an act of FGM (however described) has been carried out on her, or where the person observes physical signs on a girl appearing to show that an act of FGM has been carried out and the person has no reason to believe that the act was, or was part of, a surgical operation.

Religious, social or cultural reasons are sometimes given for FGM but FGM is child abuse, dangerous and a criminal offence for the parent/carer involved. Professionals in all

agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. Victims of FGM are likely to come from a community that is known to practise FGM. A girl at risk of FGM may not yet be aware of the practice or that it may be conducted on them so sensitivity should always be shown when approaching the subject. There is a range of potential indicators that a child or young person may be at risk of FGM, for example, a girl at immediate risk might talk about:

-
- being taken 'home' to visit family
- a special occasion to 'become a woman'
- an older female relative visiting the UK.

She may ask a teacher or another adult for help if she suspects FGM is going to happen or she may run away from home or miss school.

What to do if you are concerned

Where risk factors are present but there is no evidence of a particular risk then this should be reported to the DSL (or Deputies). In such circumstances, an appropriate senior member of staff may talk to a pupil's family, sharing the concern about the young person's vulnerability and how the family and College can work together to reduce the risk. The College if necessary will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. The College may seek external advice and make a referral to Children's Social Services (telephone Kent Safeguarding Central Duty Team 03000 411111). If there are significant concerns about a pupil, we may also notify the Multi-Agency Safeguarding Team.

Specific safeguarding issues

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. Our DSL and Safeguarding Team know where to seek and get advice as necessary. The School will bring in experts and use specialist material to support where necessary.

Further information

The NSPCC offers information on its own website

www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/on the following.

Alternatively, please refer to KCSIE 2020 for more information.

- Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)
- bullying including cyberbullying
- domestic violence
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM)

- forced marriage
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- mental health
- private fostering
- Radicalisation
- sexting
- teenage relationship abuse
- trafficking
- Whistleblowing Advice Line – 0800 0280285

Training and Induction

Every member of the academic and support staff at the College receives annual refresher training in Safeguarding and Child Protection Procedures, led by the DSL. All new members of staff receive appropriate induction training, part of which is a training session delivered by one of the DSL which includes safeguarding information relating to signs and symptoms of abuse, how to manage a disclosure from a child, guidance on relationships with pupils, how to record a concern and issues of confidentiality. The induction informs staff of their responsibility to safeguard all children at our school and the remit of the role of the DSL and Deputy.

Appendix V

Visiting Speaker Policy

Dover College ('the School') often invites speakers from the wider community to give talks to enrich our pupils' experience. The School recognises the enormous benefit gained by pupils from speakers from all walks of life. Both the School and pupils greatly appreciate the time and effort that visiting speakers put into their presentations.

The purpose of this Policy is to set out the School's legal obligations when using visiting speakers and to set out the standards of behaviour expected from visiting speakers.

This policy should be read in conjunction with the School's Safeguarding Policy.

Definition

For the purposes of this policy a 'visiting speaker' is any person who is not employed by the school who is going to be here on the premises and who will be working with our pupils in some way; whether that is through a talk or a workshop or some other means.

Overview

The Prevent statutory guidance (<https://www.gov.uk/government/publications/prevent-duty-guidance>) expects schools to have clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. This policy was therefore drawn up having had regard to the Government's Prevent Duty guidance and the School's wider safeguarding obligations.

The School's responsibility to pupils is to ensure that they can critically assess the information that they receive as to its value to themselves, and that such information is aligned to the ethos and values of the School and British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.

School Protocol

All requests for outside speakers (be this from a pupil or school staff) must firstly be discussed with the Deputy Head.

The School will undertake a risk assessment, in the form of a checklist, before agreeing to a visiting speaker attending the School: this will be carried out by the colleague organising the event and sent to the Deputy Head in advance of the event. The School may also conduct research on the visiting speaker and/or their organisation, as

appropriate. The School will not use a visiting speaker where any link is found to extremism, such as extremist groups and movements.

The member of staff in charge of the event will complete the attached checklist and ensure that the Deputy Head receives a completed copy no later than 24 hours prior to the event.

The School will obtain an outline of what the speaker intends to cover in advance of the visiting speakers visit. In some cases, the School may also request a copy of the visiting speaker's presentation and/or footage in advance of the session to ensure it is appropriate to the age and maturity of the pupils to be in attendance and does not undermine British values or the ethos and values of the School.

On arrival at the School, visiting speakers will be required to show an original current identification document including a photograph such as a passport or photo card driving licence and will be asked to sign the visitors' log. The visiting speaker will be issued with a visitors' badge which they must wear at all times whilst on school site. Visiting speakers will also be briefed on the School's Safeguarding Policy and provided with a visitors' leaflet.

Visiting speakers will be supervised by a School employee at all times whilst on School site. At no point will a visiting speaker be left unsupervised on the School site whilst pupils are present. A member of school staff will be present during the visit/talk, and they will monitor what is being said to ensure that it aligns with the values and ethos of the school and British values. In the unlikely event that the talk/presentation does not meet this requirement, visiting speakers will be informed that school staff have the right and responsibility to interrupt and/or stop a presentation. The member of staff will report this to the Deputy Head immediately after the talk/visit.

The School will keep a formal register of visiting speakers. Any information gathered will be kept in accordance with the School's Data Protection Policy.

If you have any queries regarding this Policy, please contact the Deputy Head.

Appendix VI

STAFF CODE OF CONDUCT

This Code of Conduct (which includes office protocols) should be read in conjunction with the College's **Safeguarding and Child Protection Policy and Procedures**. Staff are also required to read and abide by Part 1 of the Department for Education's statutory guidance on safeguarding children and safer recruitment in education, Keeping Children Safe in Education. Dover College takes misconduct by its staff very seriously. Dover College cannot list every example of imprudent behaviour or behaviour that would constitute misconduct and expects staff to take responsibility for their own behaviour in addition to following the code of conduct.

The code of conduct (whilst not exhaustive) consists of:

- General conduct and behaviour;
- Appropriate relationships;
- Staff prudence;
- Restrictive Physical Intervention;
- Smoking;
- Alcohol and illegal drugs;
- Anti-corruption and bribery (including gifts and donations);
- Social media;
- Attendance and timekeeping;
- Health and safety;
- Personal appearance and dress code;
- Confidentiality;
- Communication with the media;
- Outside interests;
- Office protocols.

4.1 General behaviour and conduct

Every staff member is an ambassador of the College, and as such your behaviour, position and status inside and outside of the College will affect the reputation of Dover College both positively and negatively. Pupils, their parents and other relatives, and the general public will judge the Dover College by the appearance and behaviour of the employees they meet. We expect our staff to work together to promote a positive image of the College and to build its presence in the local, national and international communities. Each employee is expected to behave towards pupils, their parents, other relatives and friends, as well as the Headmaster, the governors, and colleagues, with courtesy and consideration. In particular, employees must react to parents, pupils and colleagues with politeness in all circumstances – whatever personal feelings are or the justification for an opposite view – the employee must act calmly and professionally and avoid getting into an argument with any differences in opinion handled tactfully and professionally.

Employees are also expected to work wholeheartedly for the benefit of Dover College, to be flexible and to take on additional responsibilities so as to ensure the effective running of their department and the College. We will only ask you to carry out work you are trained to do and work which is in keeping with what you have been employed to do, but there may be times when the College relies on the flexibility and good will to cover tasks that are not their ultimate responsibility.

Ultimately staff are expected to be loyal to Dover College and where explicit guidance is not available, staff should nevertheless act in an honest and trustworthy way.

4.2 Appropriate relationships

Inappropriate relationships between staff and pupils are unacceptable.

It is an offence under the Sexual Offences Act 2003 for a person over 18 to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual. That applies where the child is in full-time education and the person works in the same place as the child, even if the person does not teach the child.

It is also unacceptable for any member of staff who is in a position of trust to have an inappropriate relationship with a pupil of any age.

Inappropriate relationships do not only extend to sexual relationships. Dover College considers communication or inappropriate socialising with pupils for example exchanging of personal mobile numbers, personal email addresses, befriending on social networks, meeting in a pub or sharing a 1-1 meal or the giving and receiving of gifts (unless in line with Dover College procedures) as inappropriate, and such activities blur the boundaries of a professional relationship.

If proven, any such activities between a staff member and a pupil, whether sexual or not, will be considered gross misconduct.

By the very nature of the age of the children in Dover College's Care, the relationship between staff and pupil is unfortunately not one of equal balance. Guidance is offered to staff to prevent inappropriate relationships developing and also to ensure that the correct procedure is followed so that members of staff are not open to allegations of impropriety, bias, abuse of a position of trust, conflict of interest or favouritism. Because there is a potential for positions of power to be abused and professional boundaries broken, Dover College is very clear that the responsibility to maintain such boundaries rests with individual staff members and not the pupil.

4.3 Personal Relationships at work

The College's policy on personal relationships at work aims to strike a balance between protecting legitimate business interests and an employee's right to a private life. There are many different types of personal relationships at work; colleagues, managers, parents, suppliers, contractors. In the context of this policy, a personal relationship is defined as:

- a family relationship;
- a business/commercial/financial relationship;
- a romantic/sexual relationship.

The above are examples of personal relationships, which may give rise to conflicts of interest in the workplace, however personal relationships are not restricted to these examples.

All employees are required to declare personal relationships, not behave inappropriately at work or allow their relationship to influence their business decisions.

The College may transfer an employee to another department on a permanent or temporary basis with the employee's agreement. The College may also change reporting lines/case-loads so that the employee reports/works with different people.

Personal relationships should be declared as soon as reasonably practicable. Declarations should be made to the Headmaster (the Headmaster should make declarations to the Board of Governors). The disclosure will be treated in confidence until the employee is ready to divulge their relationship with others, however, certain staff may need to be made aware, especially if reporting lines are changed or there is a transfer.

Failure to declare a personal relationship and/or exerting or accepting pressure or undue influence as a result of a personal relationship is a serious matter and it could result in dismissal for gross-misconduct.

4.4 Staff Prudence

Staff must exercise prudence, in accordance with the guidance contained within this policy, to aid staff/pupil relations. Prudence will also enable staff to protect themselves from criticism or even accusations of malpractice, with possible career/legal implications.

4.5 General policy

This Code of Conduct and associated staff prudence should not inhibit staff from acting in a warm manner to pupils. The following points should be heeded.

- Staff may not, without the Headmaster's prior written consent, receive any remuneration or reward for privately organised work with any pupil of the College at any time.
- Staff should take great care that relationships with individual pupils are kept on a professional level.
- Staff should be a positive role model.
- It is important that all pupils are treated the same (e.g. the use of nicknames or greater familiarity with certain pupils is inadvisable).
- Discipline must be fair and impartial.
- Staff should take care that joking comments (or sarcasm, sexist, racist and 'put down' comments) can be misconstrued or give offence (e.g. what is accepted by the recipient might not be acceptable to others in the class/group).
- As a general rule staff should not follow procedures that are at variance with College rules when with pupils.
- Follow provisions set out in the Restrictive Physical Intervention Policy

Pupils on their own

- A member of staff should not be with a pupil on their own in a flat or house or private car.
- A member of staff should not be with a pupil on their own in a room unless there is a window to the corridor or public place and unless they have told another member of staff that they need a private conversation. If there is no window, the door must be left open.
- When interviewing pupils over serious disciplinary matters it is advisable to have another member of staff present.
- When visiting pupils in their rooms on their own, staff should leave the door open or tell another member of staff about the meeting.

Groups of pupils

- A member of staff on his/her own should not be in a flat or house with a group of pupils after 23:00 PM.
- Staff should not feel that lavatories, changing rooms and showers are invisible, but they should avoid being there with an individual pupil and they should exercise caution and sensitivity in these areas. When possible it is wise to seek support from another member of staff or even a prefect.

Staff/pupil relationships

- Staff must understand that they are in a relationship of trust with our pupils.
- Any behaviour that might allow a sexual relationship to develop between a member of staff and a pupil should be avoided. Any sexual relationship within a relationship

of trust is unacceptable. Under the Sexual Offences Act 2003 it is a criminal offence for a person aged 18 or over to have sexual intercourse or engage in other sexual activity with a person under the age of 18 where the person over 18 is in a position of trust in relation to the younger person.

- Staff must report any suspicion of impropriety as set out in the **Safeguarding and Child Protection Policy and Procedures**. That member of staff will be protected from any retribution related to that complaint.

4.6 Restrictive Physical Intervention

Whilst wishing to resolve serious incidents without the use of physical intervention, Dover College understands that there are some situations in which the use of restrictive physical intervention may be the appropriate course of action. On rare occasions it may thus be necessary for a member of the Common Room to use reasonable physical force to restrict a child's movements to ensure the child's own safety or that of others. Staff are to ensure their own safety before attempting to physically intervene and are encouraged to avoid this eventuality if at all possible. However, the right of teachers to use reasonable physical force to restrict a child's movements may be used to prevent pupils committing a criminal offence, injuring themselves or others or damaging property.

- Incidents where force is used should be reported, recorded in the Restrictive Physical Intervention record and monitored. Parents should be informed.
- Teachers have a duty of care to pupils but are not required to put their own safety at risk

The purpose of the Restrictive Physical Intervention for Pupils is to safeguard the well-being of pupils and staff when an incident requires the use of restrictive physical intervention. Its intention is to develop and encourage consistent and safe practices in the use of physical restraint. Staff should not hesitate to act in an emergency provided they follow this guidance; however, they should always satisfy themselves that the action they take would be considered justifiable by a wider audience.

4.7 Behaviour management

It is an expectation that staff should treat pupils equitably, fairly and appropriately in accordance with supporting pupils to adhere to the College rules. The Prep School has separate arrangements for behaviour management, which are located within their policies.

4.8 Smoking

The health risks associated with smoking and secondhand smoke are well publicised. The Smoking Policy covers the College's arrangements to comply with regulations which came into force in July 2007 and with regulations due to come into force in October 2015. As well as highlighting fire risks, the policy also reflects guidance in accordance with NICE, in that Dover College should proactively engage in its responsibility to support both prevention and stop smoking activities. The Smoking Policy applies to everyone using the premises (including the grounds) including staff, pupils and visitors. The policy includes the use of E-cigarettes, personal vaporisers or similar devices.

Smoking is not permitted anywhere on Dover College sites or property, which includes its vehicles.

4.9 Alcohol and illegal drugs

As per Dover College's Alcohol and Illegal Drug Policy:

Staff are not permitted to drink alcohol with pupils **under any circumstances**. Staff residing on site may consume modest quantities of alcohol in private accommodation when they are not on duty / on call. Staff and pupils are also reminded to consider the effects of drinking excessive amounts of alcohol or taking illegal drugs on their behaviour when outside of work or College and how such behaviour may reflect on the College.

Staff conduct and performance must not be adversely impacted by alcohol when undertaking their duties therefore must be free from influence when at work.

The consumption of illegal drugs or 'legal highs' is not permitted on site in any circumstances and pupils and staff must be free from influence when at College, on site or at a College event / activity whether that is on or off site. The College reserves the right to request you to agree to a drugs test where the College is concerned that you have breached this policy. Should you test positive, you may be requested to take further random tests to ensure you are adhering to this policy.

Failure to adhere to this could be a disciplinary offence.

4.10 Anti-corruption and bribery (including gifts and donations)

It is the College's policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery. The College will comply with the Bribery Act 2010, in respect of our conduct both at home and abroad. The Anti-corruption and Bribery Policy covers the College's responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and provides information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

To protect employees from allegations of corruption and bribery, the policy also sets out obligations regarding the declaration of gifts and donations. It is important that all staff are fully aware of this policy to protect both themselves and the College.

4.11 Social media

Whilst Dover College recognises the benefits that the social media through the internet provides an effective platform to connect with people and organisations, the Social Media Policy sets out the principles that pupils, staff and the wider College community are expected to follow when using social media. It is crucial that all stakeholders in Dover

College, including pupils, parents, staff and the public at large have confidence in the College. The principles set out in the policy are designed to ensure that the use of social media is responsibly undertaken and that confidentiality of pupils and staff and the reputation of the College are safeguarded. The use of social media should be prudent and follow the same Dover College values as set out in the code of conduct.

The policy covers personal use of social media in College and during time off work as well as the use of social media for official College purposes, including sites hosted and maintained on behalf of the College. The internet is a fast moving technology and it is impossible to cover all circumstances or emerging media – the general principles set out in the policy must be followed irrespective of the medium.

4.12 Attendance and timekeeping

Should you need to be absent or expect to be late for any reason, you should ask your Head of Department or line manager in advance when possible. If this is not possible, please contact them at the earliest opportunity. If they are not available, the DHA should be contacted. Under most circumstances it is expected that this is done in person via a telephone (or email if it is prior to 8am) – a text message should only be used if other means of communication are not available. Staff attendance and timekeeping will be monitored and logged on ISAMS and may be raised during performance reviews as an area of concern.

4.13 Health and safety

All staff must read and adhere to the Health and safety policy and other related policies e.g., fire procedure, and the guidance in this staff handbook.

More information on Health and Safety is contained in Section 15 of Part 1 of this handbook and a full policy is available on the Dover College Website.

4.14 Personal appearance and dress code

We regularly receive visits from parents, potential parents and others, and naturally wish to convey an impression of efficiency and organisation. Therefore, whilst not wishing to impose unreasonable obligations on staff you are, nonetheless, required to look smart in appearance and maintain good personal hygiene. Should you be perceived to have breached the dress code, you may be required to remedy this. This could include being asked to change into acceptable clothing. The College has a dress code procedure listed below:

Normal dress for all members of staff is formal business wear:

- Men are expected to wear jacket and tie; women should wear an appropriate smart equivalent;
- Members of the Common Room must wear their gowns for public events – daily Chapels and Assemblies, Senior School Parents' meetings etc. For formal Sunday Chapel and on Saints' days' hoods should be worn too;

- Shorts are never acceptable in Chapel or Refectory and those taking games are expected to change at the appropriate times;
- For Dress Down and Charity Days agreed by the Headmaster, appropriate dress will be advised;
- During College holidays, the dress code is smart casual.

Role specific clothing:

- Members of staff in maintenance, grounds, kitchens, domestic and EYFS may wear clothing appropriate to their roles whilst maintaining a smart appearance. This may include Personal Protective Clothing and Equipment (PPE).

For normal College working days, subject to role specific allowances, the following dress will usually be deemed unacceptable:

- Offensive Slogans/logos/cartoon characters;
- Flip Flops (Health and Safety Reasons);
- Backless shoes/sandals (Health and Safety Reasons);
- Trainers (other than when taking games);
- Denim.

In addition, the following rules on appearance will apply:

- No underwear on show;
- Tattoos should be covered wherever possible;
- No visible piercings except earrings.
- Minimum levels of acceptable personal hygiene including that Clothes, hands, hair should be clean and tidy as well as breath and clothes not smelling of cigarette smoke whilst at work, even if this is a result of the employee smoking outside of their normal working hours or during their breaks. If necessary, the employee will need to take steps to tackle any personal hygiene problems.

4.15 Confidentiality

Any College information/records including details of pupils, parents and employees whether actual, potential or past, other than those contained in authorised and publicly available documents, must be kept confidential unless the College's prior written consent has been obtained. This requirement exists both during and after your employment. In particular, you must not use such information for the benefit of any future employer.

It is important to understand that the term 'confidentiality' also encompasses times when information needs to be shared.

Within Dover College relevant personal information will be shared on a 'need to know' basis.

This means that it will usually be shared within the team of staff that work with that pupil. It may also be shared with a line manager in supervision.

Outside of Dover College relevant personal information will usually only be shared with the pupil's and the pupils' parents' / guardians' permission. Any information shared will only be that which is currently relevant and sufficient for the particular circumstance. If the pupil / pupil's parents / guardians do not give their permission, then information will only be shared in the following circumstances:

- When there is a risk of serious harm to the individual concerned or to others;
- When there are serious concerns about the mental health of the individual concerned;
- When there are issues of child protection and Dover College's cooperation is required under the Children Act;
- When someone who has been detained under the Mental Health Act is absent from hospital without leave;
- When any other relevant law has to be observed, (e.g. the Misuse of Drugs Act), or during a Police investigation.

In these circumstances, ideally the need to share information will first be discussed with the pupil concerned and their parent / guardian. If this is not possible, steps will be taken to inform them that a decision to share information has been made, unless to do so would exacerbate the risk.

The law states that where a teacher is facing an allegation of a criminal offence involving a pupil registered at the College, the teacher concerned is entitled to anonymity until the teacher is either charged with an offence or the anonymity is waived by the teacher. If publication is made on behalf of the College, the College, including Senior Leadership and governors could be prosecuted. If a teacher is charged with such an offence, all communication must be directed through the Headmaster (or a nominated governor if the allegations are against the Headmaster) who will have authority to deal with the allegation and any enquiries to ensure that this restriction is not breached. If a member of staff is suspected to have or found to have breached (whether intentionally or otherwise) this duty, any accusations will be dealt with under the College's Disciplinary Procedure.

Therefore, confidentiality is closely related to data protection procedures, child protection and whistleblowing procedures and it is important that staff are familiar with them all.

4.16 Communications with the media

Unless a specific part of your day-to-day role (as detailed in your job description), you must not speak to or communicate with the media on matters concerning the College's affairs or regarding your position in the College without the prior written permission of the Head, Bursar or the Director of Admissions and Marketing. This includes postings on social media, e-petitions etc. where you may be identified as an employee of the College.

4.17 Outside interests

You are expected to be loyal to the stated aims and objectives of Dover College and may not engage in any outside activities or undertake any additional work, whether paid or unpaid, which in the reasonable view of the Headmaster might conflict with the College's interests or might interfere with the efficient discharge of your duties,

4.18 Office protocols

Below is a non-exhaustive list of the behaviours that are expected within Dover College. These protocols are in place to ensure staff are generally respectful of others, maintain good manners and project the image of the College positively.

a. Digital devices (mobile phones, iPod, tablets, laptops, smart watches etc.)

As well as reducing productivity, it is worth considering that perpetual use of digital devices at work can make you appear 'unavailable', unapproachable, suggests you do not wish to be disturbed or at best is simply a bit unfriendly. There should be no personal phones on the desk – they should be in a drawer or bag and muted during working hours. Staff should not use personal mobile phones when walking around the site. Use of personal digital devices should be kept to rest periods. The use of headphones to listen to music through personal mobiles / portable music devices is not allowed whilst working.

b. Personalisation and tidiness of your work / office space

An agreed limited level of personalisation of work space, including posters, ornaments, storage of personal items is acceptable. You will be advised by your line manager if any changes need to be made.

c. Manners

Most of the time when bad manners surface at work it is unintentional. It is easy to be caught up in your own tasks and projects. People's focus gets so narrow that they forget to consider the impact that their words or actions will have on other people.

At Dover College, we want to set high standards of behaviour as an example to our pupils. Therefore, we expect staff to be polite and respectful; we do this by encouraging good manners and stamping out poor manners. Disrespectful and discourteous behaviour can make members of your team unhappy and unmotivated. It can damage team spirit and productivity. With this in mind, there is simply no excuse for bad manners.

d. Email and internet expectations

- Work email accounts are not permitted to be used for personal emails;
- Avoid spamming your colleagues with chain emails;
- Use of the approved signature format;
- When emailing a group of individuals together, if necessary make use of confidentiality mechanisms like cc and bcc to preserve individual's anonymity;

- Reply as quickly as possible and if you are out of the office, you should activate an out of office reply and in it you should state when you are expected to return and who the person can contact in the interim if it is urgent;
- Sign emails off appropriately for the occasion i.e., 'cheers mate' is not acceptable in any circumstances, instead, 'regards' is far more appropriate;
- Be concise. Sometimes if the content is complicated, or could be misinterpreted it may be better to have a face to face or telephone conversation;
- Emails are a permanent record of a conversation;
- Ensure you are confident in the identity of whom you are sending information to over emails, particularly if you are sending confidential or sensitive personal information.

e. Meeting routines and etiquette

- You may be expected to attend meetings as specified by your head of department or line manager. Occasionally, some of these might be outside of your normal working hours;
- Be punctual and if you cannot attend please give apologies and any agenda items to be raised in advance to the chairperson;
- If possible, do not leave the meeting until it is closed by the chairperson.

f. Communication, telephones and chit-chat

- Make a conscious effort to avoid swearing;
- If you are frustrated with an aspect of your work, try not to let others know about it by making personal remarks or talking loudly to yourself;
- If you work in an open plan office, it is still polite to announce yourself to someone before interrupting them from their work e.g., say 'excuse me' before beginning with the matter at hand;
- It is inappropriate to leave a voicemail for someone whom you know is out of the office as a deliberate act of avoidance;
- Avoid talking loudly, gossiping about other staff or your private lives;
- Avoid making jokes which are inappropriately sexist, racist or otherwise discriminatory in their tone;
- Telephone manners should be professional, helpful, friendly and polite – it is your opportunity to replicate a visual first impression for the College over the phone;
- Make people aware if they are speaking on speakerphone;
- If you can, please answer a colleague's phone if they are away from their desk and take a message for them.

g. Use of supplies and equipment

- Don't take more than you need;

- If it's gone or there's none left, replace it or arrange for it to be replaced;
- If it is broken, let someone know about it.

h. Some other general site conduct

- Say hello to people;
- Be approachable and welcoming;
- Do not try to sell things to one another;
- Do not continually ask for sponsorships;
- Keep the place tidy – take out the rubbish occasionally;
- Please and thank you's go a long way;
- Say sorry if you have done something wrong and mean it!
- No chewing gum;
- There are designated places for charity posters and notices so please use them.

Appendix VII

Additional issues – current safeguarding priorities

Keeping Children Safe in Education 2020 make specific reference to issues of current concern. Advice on all of these is available in KCSIE.

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

Female Genital Mutilation

From October 2015, it is a statutory duty for schools to report FGM

NSPCC FGM Helpline - 0800 0283550

National guidance March 2015 “Female Genital Mutilation Risk and Safeguarding Guidance for professionals”

<https://www.gov.uk/government/publications/safeguarding-women-and-girls-at-risk-of-fgm>

Link to the NHS Site for information and resources

<http://www.nhs.uk/conditions/female-genital-mutilation/pages/introduction.aspx>

School resources and lesson plans <http://integratebristol.org.uk/resources/>

Radicalisation

From July 2015 schools are subject to the “Prevent duty”

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

Educational Institution Prevent Assessment

http://www.kelsi.org.uk/_data/assets/pdf_file/0019/31744/Education-Prevent-Assessment-SETU-Tool.pdf

Other guidance <http://www.kscb.org.uk/guidance/extremism-and-radicalisation2>

Channel general awareness online training.

http://course.ncalt.com/Channel_General_Awareness/01/index.html

Channel guidance and vulnerability assessment.

<https://www.gov.uk/government/publications/channel-vulnerability-assessment>

Child sexual exploitation

Kent Child sexual exploitation toolkit and CSE procedure

<http://www.kscb.org.uk/guidance/sexual-abuse-and-exploitation>

Spotting the Signs leaflets for children, parents/carers and professionals. Video case studies. http://www.barnardos.org.uk/what_we_do/our_work/sexual_exploitation.htm

Appendix VIII

Allegations against Members of Staff and Volunteers

Introduction

Allegations that a member of staff, supply staff, volunteer or DSL has abused a pupil or pupils either inside the College premises or during a school trip can be made by:

Parents

The abused pupil

Other members of staff

Other pupils

The Police or Social Services

A third party

An **allegation** of such seriousness should be made **directly to the Headmaster**; but if another member of staff is told first, he/she will ensure that the Headmaster and Safeguarding Lead are informed immediately, if they are unavailable, the Safeguarding Deputy should be informed. The Chair of Governors and Safeguarding Governor must be informed if the allegation is against the Headmaster. If the allegation is against the Safeguarding Lead, then the Headmaster should be informed. If an allegation is made against a member of staff, supply staff or volunteer, the quick resolution of that allegation must be a clear priority to the benefit of all concerned. In all cases the Designated Officer (LADO) must be informed immediately.

The following definitions will be used to determine the outcome of allegation investigations:

- **Substantiated**- there is sufficient evidence to prove the allegation.
- **Malicious**-there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.
- **False**- there is sufficient evidence to disprove the allegation.
- **Unsubstantiated**- there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence. Advice will be sort from the Designated Officer.

Anonymous Allegations

If there is an anonymous allegation of child abuse, which names both a member of staff (including supply staff and volunteers) and a child, it will be handled in exactly the same way as if the identity of the person making the allegation was known. Where the allegation names the member of staff (including supply staff and volunteers), but not the pupil, we

will refer to the Designated Officer and if advised interview the member of staff (including supply staff and volunteers) to ask for his/her version of events.

A record would be kept on the individual's personal file. However, if the allegation is malicious, no records will be kept.

The first response

We will respond promptly and sensitively to the legitimate concerns of the victim and his or her family. This may include victim support measures such as counselling or the utilisation of other external support mechanisms. The procedures for dealing with allegations will be applied with common sense and judgement.

We undertake to:

- Take any allegations of abuse involving a member of staff very seriously.
- Establish the facts before jumping to any conclusion.
- **All allegations are to be reported straight away to the Headmaster/Safeguarding Lead.** In the absence of the Headmaster, the Chair of Governors should be informed. In the absence of the Designated Safeguarding Lead the report should go to the Safeguarding Deputies.
- **All allegations or disclosures of abuse will be referred to the Designated Safeguarding Officer immediately and in any case within one working day, for advice before any investigation takes place. In borderline cases a discussion can be held informally with the Designated Officer and without naming the individual.**

The next step

A formal investigation is a matter for specialists, where the facts suggest that there may be reasonable grounds for suspecting actual abuse, or grooming of a child, or other criminal behaviour, the Headmaster will always discuss the allegations with the Designated Safeguarding Officer. The Designated Safeguarding Officer and the Headmaster will work together to discuss further action. The initial sharing of 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. In which case this decision and a justification for it should be recorded by both the Headmaster and the Designated Safeguarding Officer, and agreement reached on what information should be put in writing to the individual concerned and by whom. The Headmaster should then consider with the Designated Officer what action should be followed both in respect of the individual and those who made the initial allegation.

The Headmaster should inform the accused person about the allegation as soon as possible after consulting the Designated Safeguarding Officer. It is extremely important that the Headmaster provides them with as much information as possible at the time. However, where a Strategy Meeting is needed, the **Police** or **Children's Social Care Services (0300 00 411 111)** need to be involved. The Headmaster **must not** inform the accused until those agencies have been consulted, and have agreed what information can be disclosed to the accused.

Employers must consider carefully whether the circumstances of a case warrant a person being suspended from contact with children at the College and in the case of residential staff, to be suspended from the site or whether alternative arrangements can be put in place until the allegation or concern is resolved. All options to avoid suspension should be considered prior to taking that step.

Support for the pupil

Our priority is to safeguard the young people in our care. We will give all the support we can to a pupil who has been abused. The Headmaster, together with the Designated Safeguarding Lead, will consider how best to support and monitor the pupil(s) concerned through any process of investigation, liaising closely with parents or guardians.

Suspension

Suspension of a member of staff is a neutral act and does not imply that any judgement has been reached about his or her conduct. Even so, it is a serious step, and we will liaise with the Designated Officer team before an investigation.

A member of staff will be suspended where:

- There is a serious risk of harm (or further harm) to the child.
- The allegations are so serious as to constitute grounds for dismissal if proven.
- The police are investigating allegations of criminal misconduct.

In the case of a family member of a resident member of staff being suspended, pending an investigation of a child protection nature, they will be suspended from the site or if appropriate alternative arrangements will be put in place until the allegation or concern is resolved.

We recognise fully that we have a duty of care towards all of our staff, and we will always:

- Keep an open mind until a conclusion has been reached.
- Wherever possible the College will attempt to hold a meeting with a member of staff before suspending him or her.

- Keep him or her informed of progress of the investigation.
- The employee will be given the Safeguarding Lead as a named contact.

Alternatives to Suspension

We will always consider whether an alternative to suspension might be appropriate. Possibilities include:

- Sending the member of staff on leave.
- Giving him or her non-contact duties.
- Ensuring that a second adult is always present in the classroom when he or she teaches or carries out his or her duties.

If the member of staff resigns

The resignation of a member of staff, supply staff or volunteer mid-way through an investigation would **not** lead to the investigation being abandoned. The College's policy would be to complete every investigation into allegations of child abuse. **Settlement agreements cannot apply in any Safeguarding case.**

Length of investigatory process

Dover College will ensure a fair and impartial investigatory process is completed as swiftly as possible.

Recording allegations of abuse

We will record all founded allegations of abuse and subsequent actions, including any disciplinary actions, on an individual's file. A copy will be given to the individual and he or she will be told that the record will be retained until he or she reaches statutory retirement age, or for ten years, if that is longer.

Handling unfounded or unsubstantiated allegations/disclosures

The Child

A child who has been the centre of unfounded or unsubstantiated allegation or disclosure of child abuse, needs professional help in dealing with the aftermath. We will liaise closely with the KSCB (KENT SAFEGUARDING CHILDREN'S BOARD) to set up a professional programme that best meets his or her needs, which may involve the Adolescent Mental Health Services and an Educational Psychologist, as well as support from the College counsellor. We need to recognise the possibility that the allegation/disclosure of abuse was

an act of displacement, masking abuse that is actually occurring within the child's own family and/or community.

However much support the child may need in such circumstances; we need to be sensitive to the possibility that the aftermath of an unfounded allegation/disclosure of abuse may result in the irretrievable breakdown of the relationship with the member of staff. In such circumstances, we may conclude that it is in the child's best interests to move to another school. We would do our best to help him/her to achieve as smooth a transition as possible, working closely with the parents or guardians.

The Member of Staff (including supply staff and volunteers)

A member of staff (including supply staff and volunteers) could be left at the end of an unfounded or unsubstantiated allegation/disclosure of child abuse with severely diminished self-esteem, feeling isolated and vulnerable, all too conscious that colleagues might shun him/her on the grounds of 'no smoke without fire'. If issues of professional competency are involved, and though acquitted of child abuse, disciplinary issues are raised; we recognise that he or she is likely to need both professional and emotional help. We will undertake to arrange a mentoring programme in such circumstances, together with professional counselling outside the College community. A short sabbatical or period of re-training may be appropriate.

Allegations/disclosure of abuse of a child who is not a pupil at the College

If information was given that suggested that a member of staff (including supply staff and volunteers) was abusing a child who was not a pupil at Dover College, the Safeguarding Lead would immediately inform the Headmaster and pass such information to the Kent Safeguarding Children's Board (KSCB) to handle. After informing Designated Safeguarding Officer and if instructed we would inform the member of staff and formally advise him/her of the allegations, making it clear that the College would not play any part in the investigatory process. He or she would be advised of the possibility of facing suspension, re-assignment to other duties etc. in exactly the same way as if the allegation had involved a pupil of Dover College. If the allegation subsequently proved to be unfounded, he or she would be given full support by the College in resuming his/her career.

Allegations involving the Headmaster or Designated Safeguarding Lead

The Chair of Governors and Safeguarding Governor should be told at once by the Designated Safeguarding Lead of any allegations involving the Headmaster. The Headmaster WILL NOT BE informed. The Chair of Governors will make immediate contact with the Designated Safeguarding Officer to discuss the allegation, consider the nature, content and context of the allegation and an agreed course of action including any involvement with the police. Discussions will be recorded in writing and communication with both the individual and the parents of the child/children agreed. The Headmaster will

normally take leave for the duration of the investigatory process, and the Deputy Head will be made Acting Head until the conclusion of the investigation and resolution of the issue. The Headmaster should similarly be told at once of any allegation involving the Safeguarding Lead and legal advice obtained. The Designated Safeguarding Lead will normally be suspended for the duration of the investigatory process. The Deputy Designated Safeguarding Lead should be made Acting Designated Safeguarding Lead until the conclusion of the investigation and resolution of the issue.

Appendix IX

National Support

Support for staff

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline

Support for pupils

- NSPCC: www.nspcc.org.uk
- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- Young Minds: www.youngminds.org.uk
- The Mix: www.themix.org.uk

Support for adults

- Family Lives: www.familylives.org.uk
- Crime Stoppers: www.crimestoppers-uk.org
- Victim Support: www.victimsupport.org.uk
- Kidscape: www.kidscape.org.uk
- The Samaritans: www.samaritans.org
- Mind: www.mind.org.uk
- NAPAC (National Association for People Abused in Childhood): napac.org.uk
- MOSAC: www.mosac.org.uk
- Action Fraud: www.actionfraud.police.uk

Support for Learning Disabilities

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk

Domestic Abuse

- Refuge: www.refuge.org.uk
- Women's Aid: www.womensaid.org.uk
- Men's Advice Line: www.mensadvice.org.uk
- Mankind: www.mankindcounselling.org.uk

Honour based Violence

- Forced Marriage Unit: <https://www.gov.uk/guidance/forced-marriage>

Sexual Abuse and CSE

- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Stop it Now!: www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- CEOP: www.ceop.police.uk
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk

Online Safety

- Childnet International: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Parents Info: www.parentinfo.org
- Internet Matters: www.internetmatters.org
- Net Aware: www.net-aware.org.uk
- ParentPort: www.parentport.org.uk
- Get safe Online: www.getsafeonline.org

Radicalisation and hate

- Educate against Hate: www.educateagainsthate.com
- Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism
- True Vision: www.report-it.org.uk

Appendix X

Dover College Physical Restraint of Pupils

The Legal Framework Physical Restraint should be limited to emergencies and used only as a last resort. Under the Children Order 1995, it is only permissible as described under the heading "Physical Control". Article 4 of the Education Order 1998 clarifies powers that already exist in common law. It enables teachers and other members of staff in the school, authorised by the Headmaster, to use such force as is reasonable in the circumstances, to prevent a pupil from:

- Committing an offence
- Causing personal injury to a person or damage to the property of any person.
- Engaging in any behaviour prejudicial to the maintenance of good order and discipline at the school or among its pupils, whether during a teaching session or otherwise. (Examples of possible situations are given in Appendix 1)

Definition of restraint at Dover College

Physical restraint is the positive application of force with the intention of protecting the child from harming himself or others or seriously damaging property.

General policy aims

The Dover College staffing team recognise that the use of reasonable force is only one of the last in a range of strategies available to secure pupil safety and well-being and to maintain good order and discipline. Our policy on restraint should therefore be read in conjunction with our Behaviour Policy and Safeguarding policies.

Specific aims of the restraint policy

- To protect every person in the school community from harm
- To protect all pupils against any form of physical intervention that is unnecessary, inappropriate, excessive or harmful
- To provide adequate information and training for staff so that they are clear as to what constitutes appropriate behaviour and to deal effectively with violent or potentially violent situations

Why use restraint?

Physical restraint should avert danger by preventing or deflecting a child's action or perhaps by removing a physical object, which could be used to harm him / herself or others. It is only likely to be needed if a child appears to be unable to exercise self-control of emotions and behaviour. It is not possible to define every circumstance in which physical restraint would be necessary or appropriate and staff will have to exercise their own judgement in situations, which arise within the above categories.

All staff should always act within the School's policy on behaviour and discipline, particularly in dealing with disruptive behaviour. Staff should be aware that when they are in charge of children during the school day, or during other supervised activities, they are acting in loco parentis and should, therefore, take reasonable action to ensure pupils' safety and well-being.

Failure to physically restrain a pupil who is subsequently injured or injures another, could, in certain circumstances, lead to an accusation of negligence. At the same time, staff are not expected to place themselves in situations where they are likely to suffer injury because of their intervention.

Alternative strategies

There are some situations in which the need for physical restraint is immediate and where there are no equally effective alternatives (e.g. When a pupil is about to run across a road). However, in many circumstances there are alternatives e.g. the use of assertiveness skills such as:

- the broken record in which an instruction is repeated until the pupil complies
- use of a distracter, such as a loud whistle, to interrupt the behaviour (such as a fight) long enough for other methods of verbal control to be effective
- withdrawal of attention (audience) e.g. if an action such as damage to property is threatened
- other techniques designed to defuse the situation, such as the avoidance of confrontation, or use of humour (in these cases the incident can be dealt with later when emotions are no longer running high)
- the employment of other sanctions consistent with the School's policy on behaviour.

Use of physical restraint Physical restraint should be applied as an act of care and control with the intention of re-establishing verbal control as soon as possible and, at the same time, allowing the pupil to regain self-control. It should never take a form, which could be seen as a punishment.

Staff are only authorised to use reasonable force in applying physical restraint, although there is no absolute definition of this, as what constitutes reasonable force depends upon the particular situation and the pupil to whom it is being applied. However, as a general rule, only the force necessary to stop or prevent the behaviour should be used, in accordance with the guidelines below.

There are some forms of physical intervention, which may involve minimal physical contact, such as blocking a pupil's path or the staff member physically interposing him or herself between the pupil and another pupil or object. However, in some circumstances, direct physical contact may be necessary. In all circumstances other methods should be used if appropriate and effective physical restraint should be a last resort.

When physical restraint becomes necessary:

DO

- Tell the pupil what you are doing and why
- Use the minimum force necessary
- Involve another member of staff if possible
- Tell the pupil what s/he must do for you to remove the restraint (this may need frequent repetition)
- Use simple and clear language o Hold limbs above a major joint if possible e.g. above the elbow
- Relax your restraint in response to the pupil's compliance DON'T
- Involve yourself in a prolonged verbal exchange with the pupil
- Attempt to reason with the pupil
- Involve other pupils in the restraint
- Touch or hold the pupil in sexual areas
- Twist or force limbs back against a joint
- Bend fingers or pull hair
- Hold the pupil in a way which will restrict blood flow or breathing e.g. around the neck o Slap, punch, kick or trip up the pupil
- Act in temper (involve another staff member if you fear loss of control)

Actions after an incident

Physical restraint often occurs in response to highly charged emotional situations and there is a clear need for debriefing after the incident, both for the staff involved and the pupil. A member of the leadership team should be informed verbally of any incident as soon as possible and all interventions should be recorded on My Concern and ISAMS.

The senior leadership team will take responsibility for making arrangements for debriefing once the situation has stabilised. An appropriate member of the teaching staff should always be involved in debriefing the pupil involved and any victims of the incident should be offered support, and their parents/HSMs informed.

If the behaviour is part of an ongoing pattern it may be necessary to address the situation through the development of a behaviour plan, which may include an anger management

programme, or other strategies agreed by the SENCO. Any behaviour plan should always be discussed and agreed with the parent/HSM.

It is also helpful to consider the circumstances precipitating the incident to explore ways in which future incidents can be avoided. All incidents should be recorded (iSams and My Concern) immediately. All sections of this report should be completed so that in the event of any future complaint a full record is available.

A member of the leadership team will contact parents as soon as possible after an incident, normally on the same day, to inform them of the actions that were taken and why, and to provide them with an opportunity to discuss it.

Risk Assessments

If we become aware that a pupil is likely to behave in a disruptive way that may require the use of reasonable force, we will plan how to respond if the situation arises. Such planning will address:

- Management of the pupil (e.g. reactive strategies to de-escalate a conflict)
- Involvement of parents/HSMs to ensure that they are clear about the specific action the school might need to take
- Briefing of staff to ensure they know exactly what action they should be taking (this may identify a need for training or guidance)
- Identification of additional support that can be summoned if appropriate

Complaints

A clear restraint policy, adhered to by all staff and shared with parents, should help to avoid complaints from parents. It is unlikely to prevent all complaints, however, and a dispute about the use of force by a member of staff might lead to an investigation, either under disciplinary procedures or by the Police and social services department under child protection procedures. It is our intention to inform all staff, pupils, parents and governors about these procedures and the context in which they apply.

When might it be appropriate to use reasonable force?

Examples of situations that may require restraint are when: a pupil attacks a member of staff, or another pupil

- pupils fighting
- a pupil is causing, or at risk of causing, injury or damage by accident, by rough play, or by misuse of dangerous materials, substances or objects
- a pupil is running in a corridor or on a stairway in a way in which he/she might have or cause an accident likely to injure her/himself or others

- a pupil absconding from a class or trying to leave school (NB this will only apply if a pupil could be at risk if not kept in the classroom or at school)
- a pupil persistently refuses to obey an order to leave an area
- a pupil behaves in such a way that seriously disrupts a lesson.

Appendix XI

Provision for Pupils with particular religious, dietary, language or cultural needs

Dover College is committed to ensuring equality and celebrating diversity in the life of its pupils throughout all aspects of their education and will make all reasonable provision for pupils with particular religious, dietary, language or cultural needs.

The need for such provision should be identified prior to joining the school in discussion with the Admissions Department. This information will then be given to the Housemaster/mistress and Deputy Head.

The Housemaster/mistress will ensure that appropriate staff are informed. Parents should inform the Housemaster/mistress if they have a child at Dover College who has changed requirements.

Where appropriate, information about such needs will be recorded on Medical, Learning Support/ EAL lists. The Head of EAL will, with the support of the Deputy Head ensure there is the necessary support for those who have English as their second language.

In consultation with the Catering Manager, the catering department will supply a range of food to suit most needs. The Housemaster/mistress will liaise with the catering department about pupils with particular dietary needs.

Dover College is committed to nurturing a multi-faith community. The College will ensure there is provision for all the major Christian denominations and other religions. Pupils will be allowed to be absent for religious festivals and observance. We will also make allowances for religious observance in school as appropriate, for example providing rooms for prayer and reflection.

Appendix XII

Coronavirus COVID-19

Keeping Children Safe at Dover College

Keeping Children Safe in Education (KCSIE) is statutory safeguarding guidance that Dover College will continue to have regard to as per our legislative duty. The Coronavirus COVID-19 appendix continues the current safeguarding policy and staff should adhere to the principles in the [Keeping Children Safe in Education \(KCSIE\)](#), as this guidance continues to be applicable in working together to keep children safe.

COVID-19 Procedures

The way Dover College is currently operating in response to Coronavirus (COVID-19) is fundamentally important. We are continuing to educate and safeguard pupils adhering to the Dover College Safeguarding and Child Protection Policy and it is imperative that all staff continue to adopt the core principles of the policy:

The best interests of all pupils must always take priority;

If staff have a safeguarding concern about any child, they must act immediately and proportionally;

Concerns should be reported through [MyConcern](#), which will alert the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads (DDSLs);

Remember, **anyone** can make a referral. If a pupil is in immediate danger, please contact social services or the police;

Identifying peer on peer abuse - given these unusual circumstances, Dover College will continue to manage any report of such abuse and support victims appropriately (the principles as set out in part 5 of KCSIE continue to inform any revised approach);

If a member of staff has a concern about a Dover College employee or volunteer who may pose a safeguarding risk to pupils, the principles in part 4 of KCSIE will continue to support how the college responds to any such concerns.

Scope and Definitions

This addendum applies during the period of school closure due to COVID-19, and reflects both local authority advice and updated guidance from local safeguarding partners.

It outlines changes to our normal Safeguarding and Child Protection Policy in light of the Department for Education's guidance [Coronavirus: safeguarding in schools, colleges and other providers](#), and should be read in conjunction with this policy.

Unless covered here, our normal Safeguarding and Child Protection Policy continues to apply.

The Department for Education's (DfE's) definition of 'vulnerable children' includes those who:

- Have a social worker, including children:
- With a child protection plan
- Assessed as being in need
- Looked after by the local authority
- Have an education, health and care (EHC) plan

Designated Safeguarding Leads (DSLs)

- The DSL or Deputy DSLs is available to be contacted via MyConcern, email or phone;
- If the DSL or Deputy DSLs are not onsite, then a member of the Senior Leadership Team (SLT) will take responsibility for coordinating safeguarding onsite. This may include accessing child protection files, liaising with the DSL, social workers or the police;
- Dover College's Safeguarding Team is as follows:
 - DSL: Miss Julie Green
 - Deputy DSLs: Mrs Tracey Mills and Mr Jack Pyane
 - Safeguarding Officers: Mr Lee Irwin, Ms Michelle Rolfe, Miss Emma Miller and Sister Clare Hunt

Whatever the scenario, staff should be reassured that they have access to a trained DSL at all times.

Attendance

The Department for Education has introduced a [daily online attendance form](#) to keep a record of children of critical workers and vulnerable children who are attending school. This allows for a record of attendance for safeguarding purposes and allows Dover College to provide accurate, up-to-date data on the number of children taking up places.

Where any pupil expected to attend school during the closure does not attend, or stops attending, we will follow up on their absence with their parents or carers, by telephone and/or email.

Staff who are looking after key children should ensure all safety procedures are followed in order to keep themselves safe, adhering to government advice e.g. social distancing and regular and robust hand washing procedures.

Staff Training and Safeguarding Induction

All existing Dover College staff will continue to adhere to the safeguarding direction and guidance as stated in the safeguarding training and have read part 1 of KCSIE.

Where new staff are recruited, they will be provided with a safeguarding induction via Skype or telephone. This up to date annexe is an extension of the Safeguarding and Child Protection Policy and will support this process, as will part 1 of KCSIE.

Safer Recruitment/Volunteers and Movement of Staff

Dover College will continue to follow their legal duty to refer to the Disclosure and Barring Service certificate regarding anyone who has harmed or poses a risk of harm to a child or vulnerable adult. Full details can be found within paragraph 163 of KCSIE.

Schools and colleges should continue to consider and make referrals to the Teaching Regulation Agency (TRA) as per paragraph 166 of KCSIE 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.

Whilst acknowledging the additional challenges of the current environment, it is essential from a safeguarding perspective that Dover College is aware, on any given day, which staff/volunteers will be in the College; an up to date duty rota will be sent out detailing this.

As such, schools and colleges must continue to keep the Single Central Record (SCR) up to date as outlined in paragraphs 148 to 156 in KCSIE.

Online Safety

It is extremely important that Dover College continues to provide a safe environment, including online. IT Staff continue to be available via email should staff require guidance.

The [UK Council for Internet Safety provides information to help governing boards and proprietors assure themselves](#) that any new arrangements continue to effectively safeguard children online.

The [UK Safer Internet Centre's professional online safety helpline](#) also provides support for Dover College with any online safety issues they face.

Pupils and Online Safety/Remote Learning

It is important that all staff at Dover College who interact with children, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per the Safeguarding and Child Protection Policy and, where appropriate, referrals through MyConcern or to Social Services should still be made.

Recently published [guidance from the UK Safer Internet Centre on safe remote learning](#) and from the [London Grid for Learning on the use of videos and livestreaming](#) could help plan online lessons and/or activities, planning them safely.

- Staff must consider the safety of the pupils when they are asked to work online;
- Pupils must be made aware that 'screen grabs', 'screenshot' or 'print screen' functions (or similar) should not be used whilst engaged in face to face learning online;
- Staff must be dressed in a professional manner at all times;
- Pupils are aware of the protocol for online face to face learning and should be dressed appropriately;
- Before any face to face learning takes place staff should ask pupils to make parents aware that this is taking place to avoid any embarrassment;
- Staff must adhere to the same principles as set out in the Dover College Staff Behaviour Policy and Code of Conduct (within the Staff Handbook);
- Staff must adhere to the acceptable use of technology policy having due regard to staff/ pupil relationships and communication.

Mental Health

Where appropriate, we will also signpost all pupils, parents and staff to resources to support good mental health at this time.

When setting expectations for pupils learning remotely and not attending school, teachers will bear in mind the potential impact of the current situation on both children's and adults' mental health.

Support for Parents and Carers to keep their Children Safe Online

- [Internet matters](#) - support for parents and carers to keep their children safe online
- [London Grid for Learning](#) - support for parents and carers to keep their children safe online
- [Net-aware](#) - support for parents and carers from the NSPCC
- [Parent info](#) - support for parents and carers to keep their children safe online
- [Thinkuknow](#) - advice from the National Crime Agency to stay safe online
- [Childline](#) - support
- [UK Safer Internet Centre](#) - to report and remove harmful online content

- [Childnet](https://www.childnet.com/parents-and-carers/parent-and-carer-toolkit) - have updated their parent/carer toolkit that will help parents have conversations about online safety.
<https://www.childnet.com/parents-and-carers/parent-and-carer-toolkit>

The DSL will send up to date guidance to all parents/carers and pupils detailing how to stay safe online.

CEOP is the Child Exploitation and Online Protection Centre, which can be used to report any on-line abuse.

The CEOP and thinkuknow links below can both be used to report any online abuse.

<https://www.ceop.police.uk/safety-centre/>

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

These links offer advice on parental controls and filters that can be installed on devices.

<https://www.internetmatters.org/parental-controls/>

<https://uk.pcmag.com/parental-control-monitoring/67305/the-best-parental-control-software-for-2020>

<https://www.tomsguide.com/uk/us/best-parental-control-apps.review-2258.html>

Staff are likely to be in regular contact with parents, carers and pupils. These communications should reinforce the importance of pupils' online safety. It is especially important that parents and carers are aware of what their children are being asked to do online; including the websites they are being asked to access and whom at the College their child is going to be interacting with online.

Appendix XIII

Safeguarding and Remote Learning

In the event of a school closure, this being the closure of buildings rather than complete shutdown, Dover College will continue to provide education provision to ensure continuity of learning for all pupils. This will be carried out remotely using a variety of tools and platforms.

The following areas must be considered in order for the School to fulfil its obligation in terms of the provision of education whilst also ensuring the safeguarding of staff and pupils.

i. Policy

Staff should ensure they are familiar with the following policies/documents:

- Online Safety Policy
- Safeguarding and Child Protection Policy
- IT Acceptable Use Policy
- Staff Code of Conduct (within the Staff Handbook)

Pupils must be reminded of the School's expectations for them to follow:

- IT Acceptable Use Policy
- Pupil Code of Conduct
- Behaviour Policy
- Attendance

Parents should be informed of provisions for remote learning and must also ensure that they are responsible for their child/ren accessing this learning at the required times (see section iv).

ii. Resources

There is a wealth of online services and systems that enable online video and audio communication. However, where possible, Dover College encourages the primary use of Firefly and ZOOM to provide remote learning to pupils. Departments may also use platforms they regularly employ in class, such as MathsWatch and EduCare.

If a member of staff wishes to use an alternative platform to remotely educate their classes, they must seek prior permission from a member of the Senior Management Team and a clear rationale and risk assessment must be completed to support their request.

Remote learning can be delivered in two ways:

- Passive or Interactive - Teacher posts activities and student posts responses e.g. online tutorials via Firefly, MathsWatch, EduCare etc. This may also be delivered via podcast/voice tutorials. Staff should avoid one to one online tuition to help safeguard pupils and themselves. Staff should consider if the system they are using, includes an online chat feature, and if this can be muted.
- Active, interactive, live or synchronous - Pupils and staff connected in the same service at the same time - i.e. live video and audio.
 - Caution - Without expertise and experience, this may not be the most appropriate approach for pupils in the first instance.

Other factors for staff to consider are:

Age, Group Size and Ability: The use of remote learning platforms will also be influenced by the age of the pupils, size of the group being taught and their ability. For example, larger groups of pupils may be more challenging to manage during an interactive online class and so more passive or broadcast approaches could be more suitable.

Live Video: Some staff may consider using live streaming services but should exercise caution here given requirements for accounts, personal data and privacy questions.

Restrictions: Staff must consider the terms of service together with privacy policies and in particular, if there are any minimum age requirements of the chosen service.

Privacy Settings: Staff must consider privacy settings before posting – (e.g. YouTube has a variety of settings (Public, Unlisted, Private, and Comments Allowed/Not Allowed) that will determine who can see and comment on the video).

Messaging Services: Staff must be mindful of professional standards and as such, should only use the School email system or Firefly to message pupils.

iii. Technology

Although Dover College is in the fortunate position that the vast majority of pupils will have access to the technology, which will enable remote learning to take place, it is important that the School identifies any issues that both pupils and staff may have in terms of access to technology. In the event of a school closure (this being the buildings rather than complete shutdown) the Senior School Deputy Head and Prep School Deputy Head should ensure that any member of the community who may have difficulty with access are identified and loaned equipment. If the loaning of equipment is not possible, then a suitable alternative provision must be arranged to enable individuals to continue being educated or to educate.

Dover College will consider activities carefully when planning for remote education as online access within school will have internet content filtering systems in place, but this is unlikely to be replicated in the home environment.

Staff should be careful to check that any provision used does not incur surprising costs for both their pupils and themselves, e.g. mobile data access charges - (video utilises significant amounts of data).

The school technical teams are remotely on hand to provide advice and answer queries. Staff should log these in the normal way, via the IT helpdesk on their remote desktop.

Staff and pupils should consider the security of devices, in particular cameras and microphones and ensure that they are only switched on for the duration of the learning session.

Staff should be vigilant when using personal laptops and computers when working remotely. They should always check to ensure that they are not sharing personal information and that they are safeguarding their pupils as well as themselves. Therefore, Dover College strongly recommends that staff work remotely via the school's remote desktop and approved secure platforms, such as Firefly and use their school email account. In the event of a possible data breach, or any other concerns, staff are encouraged to report these to the Designated Safeguarding Lead (DSL), who will make a note and advise colleagues of any remedial action required.

iv. Education

In the event of Dover College having to educate pupils remotely, the Senior School Deputy Head and the Prep School Deputy Head will lead with any required staff changes, planning, support and managing distance learning.

Remote learning will, wherever practicably possible, continue to follow the usual school timetable, with the school day starting at 09:00 and finishing at 16:20. Each group within the school community will have specific roles to play and these are outlined below:

- **The Role of Staff** – Staff should ensure that they provide lesson content promptly, as would be expected during a normal school day. If a member of staff is educating passively, this should be available for the start of the lesson period. If they are educating actively, they should ensure they are logged on five minutes before the start of the lesson so as to begin the interaction promptly. Staff should also ensure that they have taken a register for their lesson and provided this (along with the name of the class and lesson period, e.g. L6C P1&2) to attendance at attendance@Dovercollege.Dover.sch.uk.
- **The Role of the Pupil** – Pupils should work to their usual school timetable, ensuring they are checking their emails regularly for communication and resources and logging into platforms when instructed to do so.
- **The Role of the Parent** – Parents responsibilities remain the same in terms of their child/ren attendance. Therefore parents must ensure that their child/ren are up and

ready for the school day and logged on ready for relevant lessons on their timetable.

Given that the reason for remote learning will likely be due to exceptional circumstances, it is important that staff take into consideration any reasonable difficulties pupils may face when setting work. This may mean staff will have to either plan for a lower volume of work from students or allow for extended timescales, provide for reasonable deadlines and set marking expectations and standards, which may be different from normal. However, it is imperative that staff provide remote education that has continuity.

Dover College will work with staff and pupils to identify support and training opportunities as early as practicably possible to help everyone manage their remote teaching.

It is important for staff to plan screen-based and non-screen based activities to achieve a healthy balance. It is also vital that pupils and staff are given the opportunity for reasonable breaks, activities and relaxation. Therefore, each day, the 08:30-09:00 Form/Assembly slot should have various pastoral and wellbeing activities scheduled. This, alongside the regular breaks, lunch times, Sport and Wellbeing sessions should continue to provide pupils and staff with the right balance.

v. Behaviour

Both pupils and staff are required to behave in the same manner that would be expected during a normal school day.

During scheduled lesson time, staff should maintain their classroom rules with pupils, such as arriving promptly, meeting deadlines, not interrupting and displaying respect to others.

vi. Recording

Staff should always make a note of the conference timing and who participated, including those that arrived/departed early or late. This should be sent to attendance as stated in section iv.

Staff should be clear about whether they are comfortable for certain aspects of their remote lesson to be recorded and shared. This should be approached in the same way it is during a normal school day. It is only acceptable for students to record events and share if they have the express permission of the person being recorded.

If the service being used records the interaction/conference/tutorial, please ensure that everyone is aware of this. It is important to know how long any recordings are kept for and how to access them.

vii. Personal Data

Lessons: The conference service may require the sharing of personal data, e.g. usernames to invite. It is always best practice to use school-provided email addresses as Data Protection laws still apply.

Parental communication: Unless a member of staff has a school device for making telephone calls, they should only communicate with parents via email during remote education periods.

viii. Safeguarding

If live video and audio is being used, there should be careful consideration of the location that everyone uses. It is possible that pupils may be in their bedrooms and this may not be appropriate. You may choose to use a conferencing service that the teacher can disable users' microphones and video cameras.

During live video sessions with classes, both staff and pupils are expected to dress appropriately. They do not have to wear uniform or business attire but should be dressed respectfully. As would be the case during a normal school day, staff have the right to ask a pupil to adjust their attire if they deem it unacceptable. As a rule of thumb, staff and pupils should consider what would be acceptable attire for a home clothes day.

Online or offline, effective safeguarding requires a whole-school approach. The planning for online or distance learning activities should include the school's Safeguarding Team as part of the planning process.

Ensure online tuition follows best practice (e.g. two members of staff involved) and is in-line with the School's Safeguarding and Child Protection Policy, Online Safety Policy and Staff Code of Conduct.

Staff must maintain their safeguarding obligations. Record any safeguarding incidents or potential concerns via [MyConcern](#). In the event of a Child Protection issue, staff should call the Designated Safeguarding Lead (DSL) directly on 07743 807491.

During periods of remote education, pupils should be reminded of whom they can contact within the school for help or support. These key members of staff should email pupils with this message reminding them that they are available via email.