



SAFEGUARDING (CHILD PROTECTION) POLICY

This policy applies to the whole College including **EYFS** (the Early Years Foundation Stage at DUCKS). The policy applies to all on and off-site activities undertaken by pupils whilst they are the responsibility of the College.

Everyone who comes into contact with children has a role to protect them from neglect and abuse – this document is an essential read for all adults employed by Dulwich College. Dulwich College is committed to providing a safe and secure environment for pupils, staff and visitors and has measures to deliver this, which include (but not exhaustively): designated safeguarding leads; careful governance; use of the curriculum; safer recruitment procedures; processes for disclosure and referral; codes of conduct for staff and pupils; first aid and medical plans; and training. This policy sets out these and other areas in detail.

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1. Key Safeguarding Contacts

For a full list of Safeguarding Contacts please go to [the Appendix](#) to this Policy (available on the College website). Here are some key contacts:

Designated Safeguarding Lead for the whole College		
Fiona Angel – Deputy Master Pastoral (a member of the College Leadership Team)		020 8299 9229 angelf@dulwich.org.uk
Deputy Designated Safeguarding Leads		
Whole College	Elliot Read - Assistant Head Pastoral	020 8299 5368 readje@dulwich.org.uk
Upper School	Andrew Threadgould – Head of the Upper School	020 8299 9281 threadgouldaj@dulwich.org.uk
Middle School	Nick Black – Head of the Middle School	020 8299 9255 blacknd@dulwich.org.uk
Lower School	Sameer Tanna – Head of the Lower School	020 8299 9283 tannas@dulwich.org.uk
Junior School	Toby Griffiths – Head of the Junior School	020 8299 9248 griffithstga@dulwich.org.uk
DUCKS	Miranda Norris – Head of DUCKS	020 8693 1538 norrism@dulwich.org.uk
	Sally Donaldson – Head of the Kindergarten	020 8693 1538 donaldsons@dulwich.org.uk
The Safeguarding Governor		
Vicky Flind, who can be contacted via Ms Suzanne White (PA Governance & Finance) at the College		020 8299 9306 whites1@dulwich.org.uk
Southwark LADO Duty Help Line		020 7525 3297

2. Policy Aims

The purpose of this policy is to:

- Describe what should be done if anyone in the College has a concern about the safety and welfare of a pupil who attends the College
- Identify the particular attention that should be paid to those pupils who fall into a category that might be deemed “vulnerable”
- Clarify how pupils will be kept safe through the everyday life of the College
- Identify the names of responsible persons in the College and explain the purpose of their role
- Set out expectations in respect of training
- Set out expectations regarding record keeping
- Outline how the implementation of this policy will be monitored

3. Sources

This Policy and its related procedures has been prepared in compliance with and having regard to the Education Acts; the Children Act 2004; the Education (Independent School Standards) Regulation 2014; “Working Together to Safeguard Children 2018”; “Keeping Children Safe in Education 2018”; “Protecting children from radicalisation: the prevent duty 2015”; Ofsted guidance; and procedures produced by the London Safeguarding Children Board (our LSCB) and the Southwark Safeguarding Children Board (SSCB).

This policy should be read in conjunction with the College’s Behaviour Policies, Anti-Bullying Policies, Peer-on-Peer Abuse Policy, Sexting Policy, Whistleblowing Policy, Attendance & Registration Policy, Missing Pupil Policy and Health & Safety Policy (which are publicly available on the [policies page](#) of the College’s website) and its Recruitment Policy (which is available to staff on the College’s intranet.)

Staff are required to confirm that they have read [Part 1](#) and Annex A of ‘*Keeping Children Safe in Education*’ and the College’s H R department keep a record of this.

4. Safeguarding

Safeguarding and promoting the welfare of children is everyone’s responsibility. No single professional can have a full picture of a child’s needs and circumstances. Everyone who comes into contact with children and their families has a role to play in safeguarding children (including identifying concerns, sharing information and taking prompt action). In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.

Safeguarding and promoting the welfare of children involves:

- protecting children from maltreatment (including abuse and neglect);
- preventing impairment of children's health or development;
- ensuring children grow up in safety with effective care; and
- taking action to enable all children to have the best outcomes.

5. Indicators and types of Abuse and Neglect

5.1 All College staff should be aware of the indicators of abuse and neglect so that they can identify children who may be in need of help or protection.

- **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place on-line and technology may be used to facilitate off-line abuse.
- **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child and includes domestic violence. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child (further guidance available [here](#)).
- **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from 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.
- **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities,

encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place on-line and technology can be used to facilitate off-line abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

5.2 The College recognises that all staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug-taking, alcohol abuse, deliberately missing education and sexting (youth produced sexual imagery) put children in danger.

5.3 **Peer-on-Peer abuse:** The College recognises that children are capable of abusing their peers. Peer-on-peer abuse can take many forms and some types can be gender specific. It is likely to include but may not be limited to:

- bullying (including cyberbullying);
- physical abuse (such as hitting, kicking, shaking, biting, hair-pulling or otherwise causing physical harm);
- sexual violence and sexual harassment (which can occur between two children of any age and sex, or through a group of children sexually assaulting or sexually harassing a single child or group of children);
- sexting;
- initiating or hazing-type violence and rituals.

Allegations of peer-on-peer abuse will be recorded, investigated and dealt with in accordance with the College's Anti-Bullying and Peer-on-Peer Abuse Policies, which are available on the policies page of the College's website. The initial response to a report of peer-on-peer abuse from a child is important, both for the victim and alleged perpetrator. The Deputy Master Pastoral (or, in her absence, a Deputy Designated Lead) liaises with other agencies, including the police, as appropriate, at all stages after an allegation has been made (including in offering support to the relevant parties).

The College recognises that some groups (eg children with SEND* and LGBT† children) are potentially more at risk.

5.4 **'Sexting'**: Creating and sharing sexual photos and videos of under-18s is illegal. Sharing youth produced sexual imagery, which is commonly known as 'sexting' covers the incidents where:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

When such an incident involving youth produced sexual imagery comes to a member of staff's attention, this will be shared with the designated safeguarding lead with a view to referring to appropriate agencies following the referral procedures, where appropriate. Further information and advice on youth produced sexual imagery is available in the non-statutory guidance produced by the UK Council for Child Internet Safety and in the College's Sexting Policy (which is available on the [policies page](#) of the College's website).

5.5 College staff are aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated, will be taken seriously, and is not an inevitable part of growing up;
- not tolerating or dismissing peer-on-peer abuse as "banter", "part of growing up", "just having a laugh" or "boys being boys";
- challenging behaviours (some potentially criminal in nature);

and are aware that dismissing or tolerating such behaviours risks normalising them.

5.6 College staff who work directly with children know to look out for the signs of specific forms of abuse and safeguarding issues, as listed in Annex A of Keeping Children Safe in Education (2018), especially:

- **Children missing from education:** College staff are aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding problems, for example abuse and neglect (which may include sexual abuse or exploitation and child criminal exploitation). It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention

* SEND – Special Educational Needs and Disability

† LGBT – Lesbian, Gay, Bisexual and Transgender

is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. College staff are aware of the College's unauthorised absence and children missing from education procedures (see Attendance & Registration Policy).

- **Child sexual exploitation:** Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (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 victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact: it can also occur through the use of technology. Like all forms of child sex abuse, child sexual exploitation: can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex; can still be abuse even if the sexual activity appears consensual; can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity; can take place in person or via technology, or a combination of both; can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence; may occur without the child or young person's immediate knowledge (eg through others copying videos or images they have created and posted on social media); can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.
- **Child criminal exploitation - county lines:** County lines is the term for urban gangs supplying drugs to suburban areas and market and coastal towns. It involves child criminal exploitation as drug networks and gangs groom and exploit children and young people to carry drugs and money.
- **Domestic abuse:** Domestic violence and abuse includes any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between family members or intimate partners. The abuse can encompass, but is not limited to psychological, physical; sexual; financial; and emotional issues. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.
- **Peer-on-peer abuse**

- **Preventing radicalisation**
- **Sexual violence and sexual harassment between children** in schools and colleges

5.7 College staff who work directly with children are also aware of the following specific forms of abuse and safeguarding issues:

- Children with family members in prison
- Homelessness
- So-called 'honour-based' violence

5.8 As well as obvious non-accidental injuries, injuries which are not consistent with the explanation given and incidents reported by the child or others, the following signs may be significant in the light of other concerns:

- **Physical harm:** Bruising; scarring; bandages/plasters; rubbing part of the body; cigarette burns; abstains from physical activities and resists using the changing room at school.
- **Psychological abuse/harm:** Apathy; withdrawal from social contact; loss of enthusiasm/energy; seeming to be preoccupied; tearful; misses school or is frequently late.
- **Neglect:** Socially withdrawn; untidy/unkempt; poor time-keeping; Infrequent mention of parents/family life; possibly slow to develop emotionally; overly self-reliant.
- **Sexual abuse:** Delayed or no learning progress, inappropriate sexual behaviour, low self-esteem, unease or unusual behaviour with adults, sexualised drawings, self-injury and distinct changes in behaviour.
- **Child sexual exploitation:** Children appearing with unexplained gifts or new possessions; children who associate with other young people involved in exploitation; children who have older boyfriends or girlfriends; children who suffer from sexually transmitted infections or become pregnant; children who suffer from changes in emotional wellbeing; children who misuse drugs and alcohol; children who go missing for periods of time or regularly come home late; and children who regularly miss school or education or do not take part in education.

It is important that these factors should not be seen in isolation but considered within the overall context. The College recognises that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label.

5.9 **Female genital mutilation:** DUCKS staff undertake training about indicators for Female genital mutilation (FGM) as part of their safeguarding training. FGM comprises all procedures involving

partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Whilst staff should speak to the Deputy Master Pastoral (or a Deputy Designated Safeguarding Lead) with regard to any concerns about FGM, there is a specific, legal duty on teachers. If, in the course of their work in the profession, a teacher discovers (either by disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a girl, they must personally report this to the police. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. The FGM reporting duty:

- applies to any teacher who is employed or engaged to carry out ‘teaching work’, whether or not they have qualified teacher status.
- does not apply in relation to suspected cases (ie where the teacher does not discover that an act of FGM appears to have been carried out). It is limited to ‘known’ cases’ (i.e. those which are visually identified or disclosed to a professional by the victim).

6. Preventing Radicalisation

6.1 Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is also part of the College’s safeguarding approach.

- Extremism is the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

6.2 There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child’s vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet). However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised.

6.3 The Counter-Terrorism and Security Act 2015 places a duty on schools to have due regard to the need to prevent people from being drawn into terrorism ([the ‘Prevent Duty’](#)) and [hate crimes](#). Young people can be exposed to extremist influences or prejudiced views (in particular via the internet and other social media) and schools can help to protect children from them.

6.4 The College:

- Communicates and promotes the importance of the Prevent duty to staff.
- Provides training to enable staff: (a) to recognise the engagement, intent and capability factors which indicate that a person may be vulnerable to being drawn into terrorism or at risk of radicalisation (including changes in a pupil's behaviour); (b) to challenge extremist ideas which can be used to legitimise terrorism; and (c) to know when and how to make a referral to the relevant agencies.
- Builds pupils' resilience to radicalisation by: (a) promoting their spiritual, moral, social and cultural development; (b) by promoting democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths; and (c) helping pupils to acquire the knowledge, skills and understanding that they need to play a full and active part in society.
- Teaches pupils about on-line-safety and the safe use of social media, manages internet access and ensures that there are suitable filtering arrangements in place.
- Provides a broad curriculum and ensures that pupils are offered a balanced presentation of opposing views in relation to political issues.
- Ensures that visiting speakers are suitable and that they are appropriately supervised when at the College.
- Assesses the risk of its pupils being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology.
- Works in partnership with the police, local authorities and other agencies involved with the implementation of the Prevent Strategy (including the London Safeguarding Children Board).
- Engages effectively with parents (including assisting and advising parents who raise concerns).
- Acknowledges its responsibility to act proportionately.
- Where appropriate, makes a referral to the Channel Programme.

7. **Sexual violence and sexual harassment between children in schools and colleges**

7.1 Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur on-line and off-line (both physical and verbal) and are never acceptable.

- 7.2 College staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. Sexual violence relates to sexual offences under the Sexual Offences Act 2003 (rape, assault by penetration and sexual assault).
- 7.3 Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity and each time activity occurs. College staff (and especially designated safeguarding leads and their deputies) understand consent and pupils are taught about this explicitly in Wellbeing lessons.
- 7.4 Sexual harassment refers to 'unwanted conduct of a sexual nature' that can occur on-line and off-line, and is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include: sexual comments, such as: telling sexual stories, making lewd comments; making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as: deliberately brushing against someone; interfering with someone's clothes; displaying pictures; photos or drawings of a sexual nature; and on-line sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include non-consensual sharing of sexual images and videos; sexualised on-line bullying; unwanted sexual comments and messages, including, on social media; and sexual exploitation; coercion and threats.
- 7.5 If staff have a concern about a child or a child makes a report to them which relates to child-on-child sexual violence and/or sexual harassment, they are expected to speak to the Deputy Master Pastoral (or a Deputy Designated Lead).

8. The role of the College and its staff in safeguarding children

- 8.1 Everyone who comes into contact with children and their families has a role to play in safeguarding children from abuse (including physical abuse, emotional abuse and sexual abuse) and neglect.
- 8.2 Schools are particularly important as they are in a position to identify concerns early and provide help for children, to avoid concerns from escalating. Schools may also be able to identify and help children in need and children at risk, in some cases, acting as the lead professional in undertaking an early help assessment.
- 8.3 Safeguarding pupils and providing a safe environment in which they can learn is the responsibility of the whole College community.
- 8.4 Staff are advised of the need to be alert for safeguarding issues that may arise in relation to staff-pupil relationships and the potential for bullying and peer abuse.

9. College approach

- 9.1 Dulwich College is committed to providing a safe and secure environment for pupils, staff and visitors and promoting a climate where pupils and adults will feel confident about sharing any concerns which they may have about their or another's safety or well-being.
- 9.2 The College works in partnership with parents, guardians or carers to secure the best outcomes for its pupils.
- 9.3 We provide guidance and training to staff regarding safeguarding matters and require them to comply with the Staff Code of Conduct (available to staff on MyDulwich).
- 9.4 We communicate about the aims of the College as clearly as possible. We will use clear statements in our brochures and correspondence.
- 9.5 We involve staff and pupils in the review of this policy and in the development of codes of conduct and behaviour policies and communicate these to parents.
- 9.6 We liaise with agencies in the statutory, voluntary and community sectors that are active in supporting families.
- 9.7 Where a pupil needs additional support from one or more agencies, we operate in line with locally agreed inter-agency procedures and assist the agencies involved to conduct an assessment using approaches including the 'Common Assessment Framework' and 'Team around the Child'.
- 9.8 We are alert to the needs of parents/carers who do not have English as their first language.

10. Designated Safeguarding Leads

- 10.1 The College has a team of Designated Safeguarding Leads. Their names and contact details are set out in [the Appendix](#) to this Policy (which is updated from time to time). They are led by the Deputy Master Pastoral (Fiona Angel) who is the Designated Safeguarding Lead for the whole College and also has overall responsibility for on-line safety.
- 10.2 As the Designated Safeguarding Lead for the whole College, the Deputy Master Pastoral:
- ensures this policy is known and used appropriately;
 - ensures that all staff are aware of this policy, have read all necessary documentation and have received all necessary training;
 - ensures this policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made;
 - acts as a source of support, advice and expertise to staff on matters of safeguarding;

- provides a lead on regular review of current safeguarding cases;
- leads on liaising with other agencies and sets up an inter-agency assessment if early help is appropriate;
- refers cases where a person is dismissed or has left owing to risk/harm to a child to the Disclosure & Barring Service, where required;
- refers cases where a crime may have been committed to the Police;
- liaises with the Master to inform him of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- liaises with the 'case manager' and the designated officer(s) at the local authority for child protection concerns (in cases which concern a staff member);
- liaises with staff (especially the pastoral team, the Medical Centre, and the eSafety Officer) on matters of safety and safeguarding (including on-line and digital safety) and when deciding whether to make a referral by liaising with the relevant agencies;
- is the first point of contact for external agencies pursuing Child Protection investigations and co-ordinates the College's representation at Child Protection conferences and Core Group meetings (including the submission of written reports for conferences);
- links with the Southwark Safeguarding Children Board to make sure staff are aware of training opportunities and the latest local policies on safeguarding;
- ensures the College discharges its obligations in relation to the Prevent Duty under the Counter-Terrorism and Security Act 2015, is the main point of contact for parents, pupils, staff and external agencies in all matters relating to Prevent, arranges suitable training for staff and refers cases to the Channel programme where there is a radicalisation concern;
- ensures this policy and its implementation is reviewed annually by Governors;
- provides a termly report to the Board of Governors and/or the Governors' Safeguarding Committee, outlining details of any safeguarding issues that have arisen during the term and the outcome of any cases identified. These reports will respect all issues of confidentiality and will not therefore identify any person(s) by name.

11. The Role of the Governing Body

11.1 The Governors' role is to:

- comply with their safeguarding duties under legislation and ensure that the policies, procedures and training in the College are effective and comply with the law at all times;

- ensure that the College contributes to inter-agency working in line with statutory guidance (including “*Working Together to Safeguard Children*” and “*Keeping Children Safe in Education*”);
- ensure that the College’s safeguarding arrangements take into account the procedures and practice of Southwark as part of the inter-agency safeguarding procedures set up by the Southwark Safeguarding Children Board;
- ensure that pupils are taught about safeguarding (including on-line safety);
- nominate a Safeguarding Governor to act as the lead Governor for child protection and safeguarding issues in the College; and
- review this Policy and the effectiveness of its implementation annually.

11.2 The Safeguarding Governor:

- is the lead Governor for child protection and safeguarding issues in the College;
- chairs the Governors’ Safeguarding Committee;
- meets with the Deputy Master Pastoral on a regular basis to monitor both the volume and progress of cases where a concern has been raised to ensure that the College is meeting its duties in respect of safeguarding;
- keeps fully abreast of the guidance available for safeguarding;
- visits the College to monitor its procedures; and
- liaises with Southwark and/or partner agencies on issues of child protection and allegations of abuse against the Master and/or the Deputy Master Pastoral.

11.3 The Governors review how children are taught about safeguarding in Wellbeing lessons (including safe use of electronic equipment and access to the internet).

12. Recruitment (Staff, Volunteers and Contractors)

12.1 The College is committed to safer recruitment and has adopted procedures and processes (including its recruitment policy and safeguarding checks protocols) that are intended to help deter, reject or identify people who might abuse children.

12.2 The recruitment policy and safeguarding checks protocols are available to staff on MyDulwich.

12.3 We have regard to the Department for Education’s statutory guidance for schools about the employment of staff disqualified from childcare “Disqualification under the Childcare Act 2006”, which also contains information about ‘disqualification by association’

13. Staff Duty to Report Concerns

- 13.1 All staff are instructed that if they have any concerns about a child (including concerns regarding possible peer-on-peer abuse) or identify a child in need they must report the matter immediately to the Deputy Master Pastoral or one of the College's other Designated Safeguarding Leads or direct to Southwark's Children Services (see [the Appendix](#)). If, in exceptional circumstances, the Deputy Master Pastoral (or a Deputy Designated Safeguarding Lead) is not available, staff are expected to speak to a member of the senior management team and/or take advice from Southwark's Children Services (see [the Appendix](#)), sharing any action taken with the Designated Safeguarding Lead (or a Deputy Designated Safeguarding Lead) as soon as is practically possible.
- 13.2 Once a concern has been raised, the Designated Safeguarding Lead (or a Deputy Designated Safeguarding Lead) decides on the appropriate course of action to take, such as:
- managing support for the boy internally, via the College's own pastoral support processes;
 - an early help assessment;
 - a referral for children's social care/statutory services, for example as the boy might be in need or suffering harm.

14. Early Help

- 14.1 The College recognises that all College staff should be prepared to identify children who may benefit from early help, which means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years and that early information-sharing is vital for effective identification, assessment and allocation of appropriate service provision
- 14.2 Staff are reminded to be particularly alert to the potential need for early help for a child who is, for instance:
- showing signs of being drawn into anti-social or criminal behaviour (including gang involvement and association with organised crime groups);
 - frequently going missing;
 - misusing drugs or alcohol;
 - in a family circumstance which presents challenges, such as substance abuse, adult mental health problems or domestic abuse;
 - showing early signs of abuse and/or neglect; or
 - at risk of being radicalised or exploited.

- 14.3 Safeguarding incidents and/or behaviours can be associated with factors outside the College and/or can occur between children outside the College. The context within which such incidents and/or behaviours occur is taken into account by College staff so that it can be determined whether wider environmental factors present in a child's life that are a threat to their safety and/or welfare.

15. Curriculum

- 15.1 The College acknowledges the important role that the curriculum can play in teaching children to keep themselves safe in, for example, the prevention of abuse and in the preparation of our pupils for the responsibilities of adult life and citizenship.
- 15.2 It is expected that all curriculum co-ordinators will consider the opportunities that exist in their area of responsibility for promoting the welfare and safety of pupils. The curriculum includes teaching regarding Wellbeing (including Sex Education) and on-line-safety.
- 15.3 As appropriate, the curriculum will be used to build resilience, help pupils to keep safe and to know how to ask for help if their safety is threatened.
- 15.4 The College will work with partners (including the Agencies Supporting Schools Programme (ASSP) and Safer Schools Partnership) to promote "Healthy School" status through the curriculum.

16. Mental Health

The College recognises that children and young people may experience mental health difficulties and provides a range of support (medical and non-medical) to pupils who may need help and support (see [Mental Health & Guidance Policy](#)).

17. Drugs

The College recognises that children and young people who are exposed to or involved in substance abuse are a safeguarding concern and may need help and support as outlined in [the Drugs Policy](#).

18. Missing Child and adults

- 18.1 A pupil going missing from an education setting is a potential indicator of abuse and neglect. Prolonged or repeated absences, or particular patterns of absence (with no satisfactory explanation) are treated by the College as a potential safeguarding issue and action is taken accordingly. The College monitors pupil attendance, contacts home in cases of unauthorised absence and takes further action where appropriate. The College has due regard to the guidance "Children missing education" published by the Department for Education in September 2016.
- 18.2 The College has put in place appropriate safeguarding responses to pupils who go missing from school, particularly on repeat occasions, to help identify any risk of abuse and neglect including sexual

abuse or exploitation and to help prevent the risks of their going missing in future. (The College's and DUCKS Missing Child Policies are available on [our website](#).)

- 18.3 The College is aware of the impact on children of an adult close to them going missing and work in line with [government guidance](#) in offering support.

19. Vulnerable Pupils

- 19.1 Particular vigilance will be exercised in respect of pupils who are subject to a Child Protection Plan and any incidents or concerns involving these pupils will be reported immediately to the allocated Social Worker (and confirmed in writing; copied to Southwark's Schools Safeguarding Coordinator). If the pupil in question is a looked-after child, this will also be brought to the notice of the Designated Person with responsibility for children in public care.
- 19.2 The College ensures that appropriate staff have the information they need in relation to a child's looked-after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. Appropriate staff also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The Deputy Master Pastoral keeps details of the child's social worker and the name of the virtual school head in the authority that looks after the child.
- 19.3 The College recognises that a previously looked-after child potentially remains vulnerable, that all staff should have the skills, knowledge and understanding to keep previously looked-after children safe, that it is essential to work with other agencies to ensure that prompt action is taken when necessary to safeguard these children; and that a designated teacher should be appointed to work with local authorities to promote the educational achievement of registered pupils who are looked after.
- 19.4 The College acknowledges the additional needs for support and protection of pupils who are vulnerable by virtue of disability, special educational needs ("SEN"), mental health, homelessness, refugee/asylum seeker status, the effects of substance abuse within the family, those who are young carers, mid-year admissions and pupils who are suspended from the College. The College will not make assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration. The College acknowledges children with SEN and disabilities can be disproportionately affected by problems such as bullying (without showing any outward signs) and they may have communication barriers and difficulties in overcoming them.
- 19.5 The College acknowledges that pupils who are affected by abuse or neglect may demonstrate their needs and distress through their words, actions, behaviour, demeanour, school work or confiding in and/or behaviour towards other pupils.

- 19.6 The College has a strong commitment to its anti-bullying policies and will consider all coercive acts and inappropriate child on child behaviour and sexual activity within a Child Protection context. This includes bullying (including cyber bullying), gender based violence/sexual assaults and sexting.
- 19.7 If a pupil discloses that they have witnessed domestic violence and is therefore at risk or it is suspected that they may be living in a household which is affected by family violence, this will be referred to the Deputy Master Pastoral as a safeguarding issue.

20. Boarding

- 20.1 The College acknowledges that particular safeguarding issues can arise in relation to boarding provision, including the risk of peer abuse in a residential setting and the risk of alcohol and substance misuse.
- 20.2 All boarding pupils are given the details of persons they can contact directly about personal problems or concerns at school (including how they may be contacted). This also includes appropriate agency helplines and outside contact numbers.
- 20.3 All persons visiting the boarding houses are appropriately supervised.

21. Outings and Expeditions

All pupils are spoken to regarding safeguarding during trips and expeditions. Pupils are issued with College safeguarding cards outlining safeguarding responsibilities. All pupils are issued with contact the numbers of staff should safeguarding issues arise and with the email address safeguarding@dulwich.org.uk for advice or disclosures. All appropriate safeguarding checks are made both at home and abroad according to local law. The full [Outings](#) and [Expeditions](#) Policies can be found on our website.

22. Children at risk and Children's Services Referrals

- 22.1 Any person who has concerns regarding a child may make a referral direct to Children's Services (including any parent, pupil or member of staff). The contact details of the team at Southwark's Children's Services are set out in [the Appendix](#) to this Policy.
- 22.2 When an individual concern/incident is brought to the notice of the Deputy Master Pastoral, she will decide whether or not this should be reported to Children's Services as a safeguarding issue. It is important to note however that anybody can make a referral to Children's Services. Where a referral is made to Children's Services by a member of staff the Deputy Master Pastoral should be informed, as soon as possible, that a referral has been made.
- 22.3 There must be an immediate referral to Children's Services and (if appropriate) the police whenever a child is at risk i.e. that they have suffered or are likely to suffer significant harm and/or there are concerns about maltreatment (including all forms of abuse and neglect, FGM, honour based-violence,

radicalisation and sexual exploitation). The referral should be followed up if the local authority does not offer a response within one working day.

22.4 In circumstances where a child has an unexplained or suspicious injury that requires urgent medical attention, the referral process should not delay the administration of first aid or emergency medical assistance.

22.5 If it is thought that a person may have:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates that he or she would pose a risk of harm to children,

a referral must be made to Children's Services and/the police immediately. Referrals to Southwark should be made to Southwark Multi Agency Safeguarding Hub (MASH) via a Common Assessment Framework (CAF) form and copied to Southwark's Schools Safeguarding Coordinator. Prior to any written CAF being sent as a referral to social care, there should be a verbal consultation with the MASH social worker or manager, by calling the MASH duty desk on 020 7525 1921, to ensure that making a referral is an appropriate action. The parent/carer will normally be contacted to obtain their consent before a referral is made. However, if the concern involves for example alleged or suspected sexual abuse, Honour Based Violence, fabricated or induced illness or the Designated Safeguarding Lead has reason to believe that informing the parent at this stage might compromise the safety of the child or a staff member, nothing should be said to the parent/carer ahead of the referral, but a rationale for the decision to progress without consent should be provided with the referral.

22.6 In the case of abuse by one or more pupils against another pupil, there should be a referral to Children's Services where there is reasonable cause to suspect that a pupil is suffering or likely to suffer significant harm. In such cases, all the children involved (whether perpetrator or victim) should be treated as at risk. Please also refer to the [College's and DUCKS Anti-Bullying Policies](#).

22.7 Where it comes to the College's notice that a child under the age of 13 is, or may be, sexually active, this will result in an immediate referral to Children's Services. In the case of a young person between the ages of 13 and 16, an individual risk assessment will be conducted in accordance with the London Child Protection Procedures. This will determine how and when information will be shared with parents and the investigating agencies.

22.8 DUCKS will inform Ofsted of all allegations against people living or working at the premises, or of any other abuse alleged to have taken place on the premises - as soon as practicable and always within 14 days.

23. Private Fostering Arrangements

The law requires that Southwark Children's Services are notified of private fostering arrangements. Any privately fostered children, i.e. children under the age of 16 (or under 18 if disabled) who are cared for 28 days or more by someone who is not their parent or a close relative, that come to our attention will be referred to Children's Services. Close relatives are defined as step parents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half blood or by marriage).

24. Notifying parents of injury

In situations where pupils sustain injury or are otherwise affected by an accident or incident whilst they are the responsibility of the College, parents will be notified of this as soon as possible.

25. Physical Restraint

Any physical restraint used will comply with Department for Education and Southwark guidance. In the exceptional circumstances where it becomes necessary for staff physically to restrain a pupil for their own protection or others' safety, this will be appropriately recorded and reported to the Deputy Master Pastoral and parents (see [Use of Reasonable Force Policy](#)).

26. Chastisement

Where a child sustains a physical injury or is distressed as a result of reported chastisement, or alleges that they have been chastised by the use of an implement or substance, this will immediately be reported for investigation to the appropriate local authority.

27. First Aid and Medical Plans

- 27.1 Except in cases of emergency, first aid will only be administered by qualified First Aiders.
- 27.2 All first aid treatment will be recorded and where significant will be shared with parents/carers at the earliest opportunity.
- 27.3 If it is necessary for the child to remove clothing for first aid treatment, there will, wherever possible, be another adult present.
- 27.4 If a child needs help with toileting, nappy changing or washing after soiling themselves, another adult should be present or within earshot.
- 27.5 All first aid treatment and non-routine changing or personal care will be recorded and shared with parents/carers at the earliest opportunity.

28. ICT and on-line Safety (including sexting)

- 28.1 The College recognises that the use of technology has become a significant component of many safeguarding issues and that an effective approach to on-line safety empowers a school to protect and educate the whole school community in their use of technology and has mechanisms to identify, intervene in and handle incidents that occur. Pupils have access to a secure wifi connection, which has appropriate filters and, in deterring pupils from using 3G/4G, enables activity to be monitored and acted upon.
- 28.2 Pupils are taught about on-line safety, including the risk of being exposed to harmful material, the risk of harmful interaction with others and the risk of on-line behaviour that causes or increases the likelihood of harm. They are taught about the dangers of sexting and the risks associated with location sharing.
- 28.3 All members of staff are required to have read and to follow the College's ICT Acceptable Use Policy, our Social Media Policy and our On-line Safety Policy. In addition, DUCKS has a [Mobile Phone Policy](#), governing the use of phones at DUCKS.
- 28.4 The College is very aware of the growing practice of sexting (including the sharing of sexually explicit photographs and the sending of sexually explicit messages) and the serious harm it can cause. The College has produced guidance for pupils regarding the dangers of sexting. The College has regard to the guidance published by the UK Council for Child Internet Safety.

29. Security

Entry to College premises is controlled by doors and gates that are secured physically or by staff supervision or video surveillance. Authorised visitors to the College will be logged into and out of the premises and will be asked to wear their identity badges or be issued with College visitor badges. Unidentified visitors will be challenged by staff or reported to Security.

30. Doors

All rooms that are used for the teaching or counselling of pupils will have clear and unobstructed glass panels in the doors.

31. Safeguarding allegations against Staff (including Volunteers)

- 31.1 The College takes seriously all cases that involve allegations against staff.
- 31.2 When handling any such cases, the College follows the guidance given by the Department for Education in Part Four of "Keeping Children Safe in Education".
- 31.3 Subject to the next paragraph, where there is a concern that a member of staff (including a volunteer) has:

- Behaved in a way that has harmed a child or may have harmed a child;
- Possibly committed a criminal offence against or related to a child; or
- Behaved towards a child or children in a way that indicates that he/she would pose a risk of harm if they work regularly or closely with children

this must be reported wherever possible in the first instance to the Deputy Master Pastoral (who is the Designated Safeguarding Lead for the whole College), who will inform the Master.

- 31.4 Any allegations relating to the Deputy Master Pastoral must be reported to the Master. Any allegations relating to the Master must be reported to the Child Protection Governor (Ms Vicky Flind) or the Chair of Governors (Mr Peter Riddell) or direct to Southwark Children’s Services (telephone 020 7525 3297). Governors can be contacted via Ms Suzanne White (PA Governance & Finance), whose contact details are on page 3 of this Policy.
- 31.5 Once a matter has been reported internally, advice will then immediately be sought from the Local Authority Designated Officer (“LADO”). Where a crime may have been committed or serious harm has been suffered, the matter will be reported to the police. The College will not undertake its own investigations without prior consultation with the LADO.
- 31.6 For pupils in the Early Years Foundation Stage the College will also inform Ofsted, as soon as is reasonably practicable, but at the latest within 14 days, of any allegations of serious harm or abuse by any person living, working, or looking after children on College property (whether that allegation relates to harm or abuse committed on College property or elsewhere), or any other abuse which is alleged to have taken place on College property, and of the action taken in respect of these allegations.
- 31.7 Temporary and visiting staff will be subject to the same procedures in relation to safeguarding complaints and allegations, as permanent staff.
- 31.8 If a member of staff living in the boarding houses is suspended pending an investigation of a child protection nature, the College would make arrangements for alternative accommodation (away from children) to be provided until the matter had been resolved.
- 31.9 It is a legal duty to make a report to the DBS, within one month of their leaving the College, concerning any person (whether employed, contracted, a volunteer or pupil) who has harmed, or poses a risk of harm to a child and who has been removed from working (paid or unpaid) with children, or would have been removed had he or she not left earlier.
- 31.10 Consideration will be given to making a referral to the Teaching Regulation Agency where a teacher has been dismissed for misconduct (or would have been dismissed had he/she not resigned first).

31.11 Staff who are formally disciplined for the mistreatment of pupils (or who resign before disciplinary action can be completed) will be notified to Children’s Services and the Department for Education.

31.12 If an allegation against a member of staff is substantiated, the College would work with the LADO to determine whether any improvement should be made to the College’s safeguarding procedures or practices.

32. Low Level Concerns

32.1 The College gives guidance to staff about their duty to report low level concerns, including concerns regarding the behaviour of a member of staff towards children (i.e. concerns that fall below the threshold for mandatory reporting to the local authority, see paragraph **31.3** above).

32.2 It is recognised by the College that:

- The method of commencing abuse often includes the erosion of boundaries, slow progression to abuse, use of trust and authority, meeting the child’s needs (including physical and emotional), and developing relationships with the child’s family.
- There seems to be a ‘slippery slope’ of boundary violations towards abuse and that there are many stages on the slippery slope towards the breach of a boundary within a relationship. Sometimes initial infringements are part of a grooming process but at other times they are made innocently and with good intention. However, once boundaries are breached (e.g. inappropriate conversations or other communications, inappropriate physical contact, social contact outside school and favouritism) it then becomes more difficult to restore the relationship to one in which proper boundaries are respected.
- Serious case reviews in the sector repeatedly indicate that staff, parents and parents were often aware of individual incidents of inappropriate behaviour but that there was a failure to ‘join the dots’ and take appropriate action. Concerns were not voiced; incidents were viewed in isolation and as too low level to require reporting.
- A series of low level concerns may cumulatively meet the mandatory reporting threshold and need to be reported to the local authority as such.

32.3 The “low level concerns” guidance given by the College informs staff that:

- Whilst the concern may seem very minor and one-off, the behaviour may form part of a pattern that is putting children at risk or (without intervention) may develop into such a pattern.
- The behaviour may have been innocent but the member of staff may need to be given guidance to understand why it was inappropriate and should not happen again.

- 32.4 The Deputy Master Pastoral conducts a regular review of reported low level concerns to ensure that:
- the concerns are being handled appropriately and proportionately;
 - no concerns meet the threshold of mandatory reporting to the local authority; and
 - patterns of behaviour are spotted.

33. Training

- 33.1 All staff (including volunteers and temporary staff) undergo safeguarding training at induction and that training is regularly updated in line with advice received from Southwark Children's Services and the London Safeguarding Children Board. All staff receive safeguarding updates at least annually by email or face-to-face and informally. This training covers: (a) this Safeguarding Policy (including Prevent and on-line safety) and the Low Level Concerns Policy; (b) the College's Code of Conduct, the Staff Code of Conduct, the Whistleblowing Policy, the ICT Acceptable Use Policy and the Social Media Policy (all of which are available to parents on MyDulwich); (c) the identity of the College's Designated Safeguarding Leads and Deputy Leads; and (d) Part 1 and Annex A of Keeping Children Safe in Education.
- 33.2 As part of their induction all staff (including temporary staff and volunteers) are trained regarding: this Policy, on-line safety; the role and identity of the College's Designated Safeguarding Leads and Deputy Leads; Part 1 and Annex A of Keeping Children Safe in Education;; the College's Behaviour Policy; the Staff Code of Conduct; the Low Level Concerns Policy; the Whistleblowing Policy; the ICT Acceptable Use Policy; the Social Media Policy; the Attendance and Registration and Missing Pupil policies.
- 33.3 The Designated Safeguarding Leads (and their Deputies) will attend Southwark's dedicated induction course and then refresher training at least every two years and all school leaders read Annex A of Keeping Children Safe in Education.
- 33.4 Designated Safeguarding Leads will be encouraged to attend appropriate network meetings and to participate in the multi-agency training programme organised by the Southwark Safeguarding Children Board.
- 33.5 The H R Department maintains a record of staff child protection training.

34. Records

- 34.1 Brief written notes will be kept of all incidents and child protection or child in need concerns relating to individual pupils. These notes are significant especially if the incident or the concern does not lead to a referral to other agencies. This information may be shared with other agencies as appropriate. The College will take into account the views and wishes of the child who is the subject of the concern but staff will be alert to the dangers of colluding with dangerous "secrets".

- 34.2 All Child Protection records are kept securely by the Designated Safeguarding Leads and separately from educational records. They may only be accessed by the Designated Safeguarding Leads, her Deputies and the senior managers of the College.
- 34.3 Child Protection records are reviewed regularly so that concerning patterns of behaviour can be spotted and appropriate interventions made.
- 34.4 Once places at the College for the following academic year have been accepted, the Deputy Master Pastoral writes to the Designated Safeguarding Lead at the respective feeder schools to request that they complete a confidential safeguarding/pastoral enquiry form and return this with the pupil's safeguarding file.
- 34.5 When pupils leave to go to another school, child protection/safeguarding records are sent to the receiving school separately and under a confidential cover (separately from the main pupil file). A receipt is obtained.
- 34.6 Once leavers have finalised their plans for the next academic year and following publication of A level results in August, the Assistant Head Pastoral and the Head of Upper School judge whether it is appropriate for information about a boy (beyond that included on his UCAS form) to be transferred to his university/college in the interests of his physical safety or personal wellbeing, The following list is not exhaustive, and each case must be judged on an individual basis, but information will usually be transferred where a boy:
- has a long-term medical condition which is likely to affect his ability to study;
 - has a diagnosed mental health condition, including depression, anxiety and eating disorders;
 - has been known to self-harm or to attempt to commit suicide;
 - has had prolonged periods of absence from school (for whatever reason); or
 - has an unstable home life or no fixed abode.

The Assistant Head Pastoral and the Head of Upper School write to the pupil's parents and with their consent then write to the relevant Admissions Tutor, requesting an acknowledgement from the university/college and placing this on the boy's file.

- 34.7 The content of Child Protection Conference or Review reports prepared by the College will follow the headings recommended by Children's Services and will, wherever possible, be shared with the parents/carer in advance of the meeting.
- 34.8 The College will require documentary proof as to the identity of pupils presented for admission. We will maintain accurate and up to date records of those with parental responsibility and emergency contacts.

35. Complaints

All complaints arising from the operation of this policy will be considered under the College's complaints procedure, with reference to Southwark's Strategic Lead Officer for education services as necessary.

36. Prospective parents aware of safeguarding

This policy is placed on the College website so that is available to prospective parents.

37. Review of this Policy

37.1 The Safeguarding Policy is reviewed each year and updated as necessary. The review process includes consultation with the College's team of Designated Safeguarding Leads and other staff regarding proposed amendments.

37.2 Safeguarding is on the agenda for staff meetings each term. It is the duty of the Deputy Master Pastoral to provide all necessary information and to make a report at such meetings.

The Governors have formally adopted this policy and review its contents annually or sooner if any legislative or regulatory changes[‡].

The Rt Hon Peter Riddell CBE

Chair of Governors

Vicky Flind

Safeguarding Governor

Fiona Angel

Deputy Master Pastoral & Designated Safeguarding Lead

[‡] *Safeguarding Policy – revisions since January 2015: Reviewed May 2015, June 2015, October 2015, December 2015, September 2016, February 2017, November 2017, January 2018 and September 2018*